



Edward B. Hatchett, Jr.
Auditor of Public Accounts

July 10, 2000

To the People of Kentucky
Honorable Paul E. Patton, Governor
Honorable Jody Richards, Speaker of the House
Honorable David L. Williams, President of the Senate
Beverly Watts, Executive Director, Commission on Human Rights
Robert Sherman, Director, Legislative Research Commission

In accordance with Chapter 344.015(3) of the Kentucky Revised Statutes, the Auditor of Public Accounts submits the Commonwealth of Kentucky's *Report on Compliance With Civil Rights Laws Including Agency Title VI Implementation Plans, Updates, and Compliance Reports* of state agencies.

Title VI of the Civil Rights Act of 1964 prohibits any program or activity receiving federal funds from excluding participation, denying benefits, or subjecting any individual to discrimination, on the basis of "race, color, or national origin." In accordance with legislation passed by the 1994 General Assembly, state agencies receiving federal funds are required to develop an implementation plan and submit annual compliance reports to the Auditor of Public Accounts so that the public may learn whether and how well state agencies are complying with Title VI. The Office of the Auditor of Public Accounts applies comprehensive Title VI testing procedures during its audits of state agencies.

The results of these procedures are cited in the noncompliance and comment and recommendation sections of this report.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ed Hatchett".

Edward B. Hatchett, Jr.



**REPORT ON COMPLIANCE WITH CIVIL RIGHTS LAWS
INCLUDING
AGENCY TITLE VI IMPLEMENTATION PLANS,
UPDATES, AND COMPLIANCE REPORTS**

AS REQUIRED BY KRS CHAPTER 344

For the Year Ended June 30, 1999

**EDWARD B. HATCHETT, JR.
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**REPORT ON COMPLIANCE WITH CIVIL RIGHTS LAWS INCLUDING AGENCY TITLE VI
IMPLEMENTATION PLANS, UPDATES, AND COMPLIANCE REPORTS**

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IMPLEMENTATION PLANS, UPDATES, AND COMPLIANCE REPORTS (CONTINUED)**

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**REPORT ON COMPLIANCE WITH CIVIL RIGHTS LAWS INCLUDING
AGENCY TITLE VI IMPLEMENTATION PLANS, UPDATES, AND
COMPLIANCE REPORTS**

EXECUTIVE SUMMARY

REPORT ON COMPLIANCE WITH CIVIL RIGHTS LAWS INCLUDING AGENCY TITLE VI IMPLEMENTATION PLANS, UPDATES, AND COMPLIANCE REPORTS

EXECUTIVE SUMMARY YEAR ENDED JUNE 30, 1999

Title VI of the Civil Rights Act of 1964 guarantees the access of all citizens to federally assisted programs. Section 601 of the Civil Rights Act of 1964 states that “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

Purpose and Scope

In 1994, the General Assembly enacted Senate Bill 248 (KRS 344.015). This bill requires all State agencies to prepare and submit Title VI implementation plans and annual plan updates to the Auditor of Public Accounts and the Kentucky Commission on Human Rights by July 1 of each year if the agency is subject to Title VI of the Federal Civil Rights Act of 1964. This report contains the Title VI implementation plans and annual plan updates due July 1, 1999.

45 KAR 1:080 states that the Auditor of Public Accounts is responsible for preparing and issuing the Statewide Single Audit of the Commonwealth of Kentucky, including compliance with Title VI requirements. Comments and recommendations from this work for the year ended June 30, 1996 can be found in the “Civil Rights Noncompliance From The Statewide Single Audit Report For The Year Ended June 30, 1996” section below. 45 KAR 1:080 also details the format that agencies are required to use when submitting the initial Title VI implementation plan and annual plan updates.

Compliance Assessment

The Auditor’s office reviewed each agency’s Title VI implementation plan and annual plan update due July 1, 1999. A spreadsheet detailing each agency report’s compliance with the 13 requirements of 45 KAR 1:080 has been prepared and is presented herein (pages 14-17). (See pages 8-13 for 45 KAR 1:080. Note that 1-13 across the top of the table corresponds to the 13 required components per 45 KAR 1:080 Section 4. The 6 components to be updated annually are shaded.)

**TITLE VI OF THE FEDERAL CIVIL RIGHTS ACT OF 1964
NONDISCRIMINATION IN FEDERALLY ASSISTED PROGRAMS**

**TITLE VI OF THE FEDERAL CIVIL RIGHTS ACT OF 1964
NONDISCRIMINATION IN FEDERALLY ASSISTED PROGRAMS**

42 U.S.C.A. §§ 2000d THROUGH 2000d-4a

SEC. 2000d. No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

SEC. 2000d-1. Each Federal department and agency which is empowered to extend Federal financial assistance to any program or activity, by way of grant, loan, or contract other than a contract of insurance or guaranty, is authorized and directed to effectuate the provisions of section 2000d of this title with respect to such program or activity by issuing rules, regulations, or orders of general applicability which shall be consistent with achievement of the objectives of the statute authorizing the financial assistance in connection with which the action is taken. No such rule, regulation, or order shall become effective unless and until approved by the President. Compliance with any requirement adopted pursuant to this section may be effected (1) by the termination of or refusal to grant or to continue assistance under such program or activity to any recipient as to whom there has been an express finding on the record, after opportunity for hearing, of a failure to comply with such requirement, but such termination or refusal shall be limited to the particular political entity, or part thereof, or other recipient as to whom such a finding has been made and, shall be limited in its effect to the particular program, or part thereof, in which such non-compliance has been so found, or (2) by any other means authorized by law: Provided, however, That no such action shall be taken until the department or agency concerned has advised the appropriate person or persons of the failure to comply with the requirement and has determined that compliance cannot be secured by voluntary means. In the case of any action terminating, or refusing to grant or continue, assistance because of failure to comply with a requirement imposed pursuant to this section, the head of the Federal department or agency, shall file with the committees of the House and Senate having legislative jurisdiction over the program or activity involved a full written report of the circumstances and the grounds for such action. No such action shall become effective until thirty days have elapsed after the filing of such report.

SEC. 2000d-2. Any department or agency action taken pursuant to section 2000d-1 of this title shall be subject to such judicial review as may otherwise be provided by law for similar action taken by such department or agency on other grounds. In the case of action, not otherwise subject to judicial review, terminating or refusing to grant or to continue financial assistance upon a finding of failure to comply with any requirement imposed pursuant to section 2000d-1 of this title, any person aggrieved (including any State or political subdivision thereof and any agency of either) may obtain judicial review of such action in accordance with chapter 7 of Title 5, and such action shall not be deemed committed to unreviewable agency discretion within the meaning of that chapter.

TITLE VI OF THE FEDERAL CIVIL RIGHTS ACT OF 1964
NONDISCRIMINATION IN FEDERALLY ASSISTED PROGRAMS
42 U.S.C.A. §§ 2000d THROUGH 2000d-4a
(CONTINUED)

SEC. 2000d-3. Nothing contained in this subchapter shall be construed to authorize action under this subchapter by any department or agency with respect to any employment practice of any employer, employment agency, or labor organization except where a primary objective of the Federal financial assistance is to provide employment.

SEC. 2000d-4. Nothing in this subchapter shall add to or detract from any existing authority with respect to any program or activity under which Federal financial assistance is extended by way of a contract of insurance or guaranty.

SEC. 2000d-4a. For the purposes of this subchapter, the term “program or activity” and the term “program” mean all of the operations of—

- (1) (A) a department, agency, special purpose district, or other instrumentality of a State or of a local government; or
(B) the entity of such State or local government that distributes such assistance and each such department or agency (and each other State or local government entity) to which the assistance is extended, in the case of assistance to a State or local government;
- (2) (A) a college, university, or other postsecondary institution, or public system of higher education; or
(B) a local educational agency (as defined in section 8801 of Title 20), system of vocational education, or other school system;
- (3) (A) an entire corporation, partnership, or other private organization, or an entire sole proprietorship—
 - (i) if assistance is extended to such corporation, partnership, private organization, or sole proprietorship as a whole; or
 - (ii) which is principally engaged in the business of providing education, health care, housing, social services, or parks and recreation; or
(B) the entire plant or other comparable, geographically separate facility to which Federal financial assistance is extended, in the case of any other corporation, partnership, private organization, or sole proprietorship; or
- (4) any other entity which is established by two or more of the entities described in paragraph (1), (2), or (3):

any part of which is extended Federal financial assistance.

NOTE: 42 U.S.C.A. §§ 2000d-5 through 2000d-7 are not reproduced here.

KENTUCKY REVISED STATUTE

KENTUCKY REVISED STATUTE

KRS 344.015 Implementation plans for Federal Civil Rights Act, Title VI by state agencies.

- (1) As used in this section, “state agency” means any department or administrative body of state government, as defined in KRS 12.010, that is subject to the requirements of Title VI of the Federal Civil Rights Act of 1964, 42 U.S.C. secs. 2000d et seq., and regulations promulgated thereunder.
- (2) Each state agency shall:
 - (a) Develop a Title VI implementation plan by January 1, 1995. If required by Title VI or regulations promulgated thereunder, the implementation plan shall:
 1. Be developed with the participation of protected beneficiaries; and
 2. Include Title VI implementation plans of any subrecipients of federal funds through the state agency;
 - (b) Submit a copy of the implementation plan to the Auditor of Public Accounts and the Human Rights Commission; and
 - (c) Submit annual Title VI compliance reports and any implementation plan updates to the Auditor of Public Accounts and the Human Rights Commission by July 1, 1995, and each July 1 thereafter.
- (3) The Auditor of Public Accounts shall prepare a report on the actions which state agencies are required to take to implement Title VI, and a report summarizing and evaluating, relative to the required implementation actions, the initial state agency implementation plans and including audit findings from the Auditor of Public Accounts field reviews. The Auditor of Public Accounts shall transmit the reports to the Governor, the Human Rights Commission, the Legislative Research Commission, and each state agency. The Auditor of Public Accounts may prescribe the report format, procedure, and time frame for purposes of complying with this subsection. The prescribed format, procedure, and time frame shall be established by administrative regulation pursuant to KRS Chapter 13A.
- (4) In addition to being available from the promulgating state agency, all implementation plans, reports, and updates required by and submitted under subsection (2) of this section shall be available for inspection and copying under KRS 61.870 to 61.884 in the offices of the Auditor of Public Accounts.
- (5) In any annual audit made of a state agency under KRS 43.050, the Auditor of Public Accounts shall determine whether the state agency has complied with subsection (2) of this section and shall include the determination in the audit report.
- (6) To the extent permitted by federal law or regulation, any increased costs incurred by a state agency, the Auditor of Public Accounts, or the Human Rights Commission under this section shall be paid from any available federal funds that may be used for implementation of Title VI of the Federal Civil Rights Act of 1964.

Effective: July 15, 1994

History: Created 1994 Ky. Acts ch. 204, sec. 1, effective July 15, 1994.

KENTUCKY ADMINISTRATIVE REGULATION

KENTUCKY ADMINISTRATIVE REGULATION

45 KAR 1:080. Standards for Title VI reporting.

RELATES TO: KRS Chapter 344, 42 USC 2000d

STATUTORY AUTHORITY: KRS 344.015

NECESSITY, FUNCTION, AND CONFORMITY: The 1994 General Assembly enacted Senate Bill 248 (KRS 344.015) which requires that all state agencies as defined in KRS 12.010 prepare and submit Title VI implementation plans and annual updates to the Auditor of Public Accounts if the agency is subject to Title VI of the Federal Civil Rights Act of 1964. The Auditor of Public Accounts is responsible for the preparation and issuance of the Single Statewide Audit of Federal Funds for Kentucky state government including compliance with Title VI requirements. This administrative regulation establishes the uniform format agencies are required to use when submitting the Initial Implementation Title VI Plan and Annual Plan Updates to the Auditor of Public Accounts.

Section 1. (1) Title VI Initial Implementation Plan and Annual Plan Updates shall:

- (a) Be submitted in the format set out in Section 4 of this administrative regulation; and
 - (b) Contain the information specified by the provisions of this administrative regulation.
- (2) The entire agency shall be in compliance with Title VI, even if only one (1) federal grant is received.
- (3) Standard complaint forms or guidelines shall be developed and adopted by the agency.
- (4) Complaints shall be filed orally or in writing.
- (5) A compliance review instrument shall be developed by the agency, such as, a self-survey, assessment checklist, preaward, routine or enforcement plan, along with the criteria for selecting and scheduling reviews.
- (6) The agency shall provide persons with information relating to its Title VI plan, nondiscrimination policies, complaint procedures, programs and services.
- (a) This information may include, brochures, newsletters, contract agreements, educational materials, Title VI Act and federal regulations, and preventive outreach programs.
 - (b) Informational materials shall be made available in a centralized place for distribution upon request.
- (7) The agency shall submit annual Title VI compliance reports and updates to the plan.

KENTUCKY ADMINISTRATIVE REGULATION (CONTINUED)

(8) Agency and subrecipients shall establish a system for data collection and reporting data which shows the extent to which members of protected parties are participating in the programs and activities.

Section 2. For all state agencies receiving federal funds, an annual Title VI plan update shall be submitted to the Auditor of Public Accounts and the Kentucky Commission on Human Rights by July 1, 1995 and by July 1 each year thereafter.

Section 3. If a state agency that was not a recipient of federal funds on January 1, 1995, receives federal funds it shall prepare and submit the Title VI implementation plan within ninety (90) days of award and receipt of the federal funds.

Section 4. The federal Title VI implementation plan shall contain the information prescribed by this section in succinct and concise language. Subsections (6), (7), (9), (10), (12) and (13) of this section shall be updated annually.

(1) Glossary/definitions. Definitions of all common terms stated in the plan shall be included in this section to ensure that agency staff, recipients and beneficiaries have consistent applicable definitions.

(2) Overview. A clear and brief description of the agency mission and structure and the relationship of Title VI requirements to the agency's operations.

(3) Scope of Title VI applicability to programs and activities. Specify prohibited discrimination practices under Title VI in relation to agency activities.

(4) Responsible official. The name, title, address and telephone number of the primary contact for the agency and the person in charge of implementation, compliance and reporting shall be designated in this section.

(5) Statement of assurances.

(a) Provide a statement that the agency, subrecipients and all parties involved have complied with Title VI.

(b) This statement shall be consistent with any assurances provided to the applicable federal agency which provides funding for covered activities. Also include:

1. A statement that a subrecipient shall have agreed in writing to adopt the Title VI plan of that agency.

2. If the subrecipient's Title VI plan differs from the state agency plan, a statement that the subrecipient plan shall be available for review from the name and title of officials identified in subsection (4) of this section.

KENTUCKY ADMINISTRATIVE REGULATION (CONTINUED)

(6) Identify programs or activities subject to Title VI.

(a) Identify each program, type of assistance identified in the federal grant agreement, and the manner in which the agency shall deliver the service or perform the activity.

(b) List the federal program, coverages and potential beneficiaries.

(7) Complaint procedures.

(a) Describe the complaint procedures within the agency as follows:

1. How a complaint shall be filed;
2. Where to file a complaint;
3. Time frame within which the complaint shall be processed by the agency; and
4. Withdrawal of a complaint;

(b) Describe agency procedures relating to investigations, report of findings, hearings and appeals.

(8) Compliance/noncompliance reporting.

(a) Describe agency plans to regulate, monitor, review, and report on the federal programs to assure compliance.

(b) Identify actions to be taken by the agency upon a finding of noncompliance, including:

1. Processing;
2. Reporting;
3. Resolution;
4. Enforcement of corrective actions; and
5. Monitoring of programs.

(9) Agency training plan.

(a) Describe the agency education and training plan, orientation, and technical assistance related to agency implementation of the plan;

KENTUCKY ADMINISTRATIVE REGULATION (CONTINUED)

(b) Identify ways the agency plans to improve staff capability, knowledge and effectiveness.

(10) Evaluation procedures of Title VI plan.

(a) Specify how the agency shall measure its goals and the time frame established to achieve those goals.

(b) The agency shall:

1. Describe how it plans to evaluate the Title VI plan and maintain continued compliance;
2. Identify any existing needs or plan deficiencies;
3. Maintain written progress reports; and
4. Describe corrective procedures.

(11) Public notice and outreach.

(a) Identify how the agency shall inform persons about the agency's:

1. Title VI plan;
2. Complaint procedures;
3. Nondiscrimination policy; and
4. Programs and services.

(b) Identify the agency contact person, office or department responsible for distribution of information relating to paragraph (a) of this subsection.

(12) Recordkeeping and reporting.

(a) Describe the recordkeeping procedures for the following:

1. Filing and processing of complaints;
2. Administrative data or records applicable to the plan;
3. Data sheets, including, a complaint log or performance reports, standardized forms, and retention of records.

KENTUCKY ADMINISTRATIVE REGULATION (CONTINUED)

(b) Changes in subsections (8) and (9) of this section of the plan shall be identified in this subsection.

(c) Provide reporting data showing the extent to which members of protected parties are participating in the Title VI programs and activities.

(13) Minority representation on planning board or advisory body.

(a) Describe the representation of minorities on any agency board or advisory body;

(b) If minority representation is deficient on these bodies, describe what policy the agency shall implement to ensure minority participation on advisory bodies; and

(c) Describe the race and national origin of the agency's staff.

Section 5. The agency shall submit Title VI initial plans, and annual Title VI plan updates on the "Commonwealth of Kentucky, Auditor of Public Accounts, Title VI of the Federal Civil Rights Act, Implementation Initial Plan and Plan Update Form" (1995).

Section 6. Incorporation By Reference. (1) "Commonwealth of Kentucky, Auditor of Public Accounts, Title VI of the Federal Civil Rights Act, Implementation Initial Plan and Plan Update Form" (1995) is incorporated by reference.

(4) This document may be inspected, copied, or obtained at the Office of the Auditor of Public Accounts, 144 Capitol Annex, Frankfort, Kentucky 40601, 8 a.m. to 4:30 p.m., Monday through Friday. (21 Ky.R. 1399; eff. 2-8-95.)

SCHEDULE OF COMPLIANCE WITH 45 KAR 1:080 SECTION 4

SCHEDULE OF COMPLIANCE WITH 45 KAR 1:080 SECTION 4 - YEAR ENDED JUNE 30, 1999

	Glossary	Overview	Scope of Applicability	Responsible Official	Statement of Assurances	ID Programs Under Title VI	Complaint Procedures	Noncomply – Comply Rpt	Agency Training Plan	Evaluation Proc. Of Plan	Notice & Outreach	Recordkeep & Reporting	Minority Rep. on Boards
AGENCY	1	2	3	4	5	6	7	8	9	10	11	12	13
Department of Agriculture	na	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Department of Alcoholic Beverage Control	Y	Y	N16	N12	Y	Y	N7	Y	Y	Y	N10	N2	N17
Office of the Attorney General	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N2	Y
Office of the Governor	Y	Y	N16	N12	X	X	N18	Y	N23	N24	N10	Y	N17
Kentucky Commission On Human Rights	^	^	^	Y	^	Y	^	^	^	^	^	^	Y
Kentucky Council On Postsecondary Education (FKA: Kentucky Council On Higher Education)	Y	Y	Y	Y	Y	N6	N7	N8	Y	N9	N10	Y	N11
Department For Local Government	Y	Y	Y	Y	Y	Y	N7	Y	Y	N4	Y	Y	Y
Department of Military Affairs &&	N1	^	^	^	N25	^	N7	^	^	N4	N21	N2	N13
Cabinet for Economic Development—Department of Community Development	N5	N5	N5	N5	N5	N5	N5	N5	N5	N5	N5	N5	N5
Kentucky Department of Education ~	^	^	^	^	^	^	^	^	^	^	^	^	^
Kentucky Educational Television ~	^	^	^	^	^	^	^	^	^	^	^	^	^
Kentucky Arts Council ~	^	^	^	^	^	^	^	^	^	^	^	^	^
Kentucky Center for the Arts ~	N1	Y	N22	N12	N3	N22	N7	Y	Y	N9	N10	N2	N13
Kentucky Heritage Council ~	^	^	^	^	^	^	^	^	^	^	^	^	^
Kentucky Historical Society ~	^	^	^	^	^	^	^	^	^	^	^	^	N17
Department for Libraries & Archives ~	N5	N5	N5	N5	N5	N5	N5	N5	N5	N5	N5	N5	N5
Finance and Administration Cabinet	*	*	*	*	*	N14	Y	*	Y	Y	*	Y	Y
Kentucky Higher Education Assistance Authority	^	^	^	^	^	^	^	^	^	^	^	^	Y
Kentucky Higher Education Student Loan Corporation	^	^	Y	^	^	Y	^	^	^	Y	^	Y	Y
Kentucky Housing Corporation	Y	Y	N16	N12	Y	Y	N7	Y	Y	N9	Y	N2	Y
Cabinet for Families and Children	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N17
Cabinet for Health Services	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Justice Cabinet	N1	Y	Y	Y	Y	N6	N7	N25	Y	N9	N21	N2	Y
Labor Cabinet	Y	Y	Y	Y	Y	Y	Y	N20	Y	Y	Y	Y	N17
Natural Resources and Environmental Protection Cabinet	^	^	^	^	^	^	^	^	^	^	^	^	^
Crime Victims Compensation Board	^	^	^	^	^	^	^	^	^	^	^	^	^
Department of Mines and Minerals	Y	Y	N16	N12	Y	Y	N7	Y	Y	N9	N10	N2	N17
Department of Public Advocacy	^	^	^	Y	^	N19	N7	^	Y	N9	^	N2	N13
Public Service Commission	Y	Y	N16	N12	Y	Y	N7	Y	Y	N9	N10	N2	N17
Kentucky Revenue Cabinet	N22	Y	N16	N12	N22	Y	N22	N22	N22	N22	N22	N22	N22
Tourism Development Cabinet	Y	Y	Y	Y	Y	Y	N7	Y	Y	N15	Y	N2	N13
Transportation Cabinet	N22	Y	Y	Y	Y	Y	N7	N22	N23	N9	N22	N22	N22
Cabinet for Workforce Development @	*	*	*	*	*	Y	N7	*	Y	N24	*	N2	Y

NOTE: 1-13 across the top correspond to the 13 required components per 45 KAR 1:080 Section 4 (Table of Contents-V). The 6 components required to be updated annually are highlighted.

**SCHEDULE OF COMPLIANCE WITH 45 KAR 1:080 SECTION 4
YEAR ENDED JUNE 30, 1999 (CONTINUED)**

TICK MARK LEGEND

Y	The plan/update contains the necessary information.
*	The agency only sent the update (six required components).
^	The agency sent a one page update that indicating "No Changes."
X	The agency did not include this component in the Implementation plan
~	The agency adopted Implementation plan of a Cabinet.
N1	The plan/update does not contain glossary section.
N2	The plan/update does not address one or more of the following: recordkeeping procedures for filing and processing of complaints, administrative data or records applicable to plan, data sheets (such as complaint logs or performance reports), standardized forms, and/or retention of records.
N3	A statement regarding subrecipients' adoption of Title VI plan of agency or statement that the plan of subrecipient shall be available for review is not included in the plan/update.
N4	Too general. The plan/update does not address how the agency will measure goals, the time frame established to achieve goals, or progress reports.
N5	The agency sent in a page listing updates, however, they did not break the update down into the 13 requirements of 45 KAR 1:080.
N6	The plan/update does not explain the type of assistance identified in the federal grant agreement and the manner in which the agency shall deliver the service or perform the activity.
N7	The plan/update does not address one or more of the following: how a complaint should be filed, where to file a complaint, withdrawal of complaints, agency procedures relating to investigations, report of findings, and/or hearings and appeals.
N8	The plan/update does not describe how the agency plans to regulate, monitor, review or report on the federal program to assure compliance.
N9	The plan/update does not specify the time frame to achieve goals, does not describe how agency plans to evaluate Title VI and maintain continued compliance, identify any existing needs or plan deficiencies, maintain written progress reports or describe corrective procedures.
N10	The agency contact person, office or department responsible for distribution of information was not identified.
N11	No description of race and national origin of agency staff was in the plan/update.
N12	The plan/update does not specify one or more of the following: primary contact name, title, address, or telephone number.
N13	The plan/update does not describe representation of minorities on agency or advisory board and does not describe race and national origin of agency's staff.

**SCHEDULE OF COMPLIANCE WITH 45 KAR 1:080 SECTION 4
YEAR ENDED JUNE 30, 1999 (CONTINUED)**

TICK MARK LEGEND

- N14** The plan/update did not identify each program, type of assistance identified in federal grant agreement and manner agency shall deliver service or perform activity; NOTE: The agency did state "There were no changes to However, a change did occur in" In the prior year the agency was cited for a noncompliance in this area. Since there were no changes, the noncompliance still exists for the current year. The instance where there was a change did not meet the requirements.
- N15** The plan/update does not address any existing needs or plan deficiencies, maintenance of progress reports, or corrective procedures.
- N16** The plan/update does not specify prohibited discrimination practices under Title VI in relation to agency activities.
- N17** The plan/update does not break down race and national origin of agency staff; but does tell the number of minorities on the staff.
- N18** The plan/update does not describe withdrawal of complaints or describe agency procedures relating to investigations, report of findings, and hearings and appeals.
- N19** Too general. The plan/update does not identify each program, type of assistance identified in the federal grant agreement, and manner agency shall deliver services or perform activities. Also the plan/update does not list federal program, coverages, and potential beneficiaries.
- N20** The plan/update does not identify actions to be taken upon finding a noncompliance including processing, reporting, resolution, enforcement of corrective actions, and monitoring programs.
- N21** The plan/update does not identify one or more of the following: how the agency will inform persons about the Title VI plan, complaint procedures, nondiscrimination policy, programs and services, agency contact person, and/or office or department responsible for distribution of information.
- N22** The plan/update does not make reference to one or more of the 13 requirements.
- N23** The plan/update does not describe the agency education and training plan, orientation, or technical assistance related to agency implementation of the plan or describe ways the agency plans to improve staff capability, knowledge, and effectiveness.
- N24** The plan/update does not explain the time frame established to achieve goals. Also, the plan/update does not describe how the agency plans to evaluate the Title VI plan and maintain compliance, identify any existing needs or plan deficiencies, maintain written progress reports or describe corrective procedures.
- N25** The plan/update does not address actions to be taken by the agency upon a finding of noncompliance.
- &&** The agency sent in one page saying no changes, however, last year errors were noted in the agency's 1996 Plan. These errors are recorded on the table above.
- na** The plan/update states "No glossary needed."
- @** We reviewed the 1998 implementation plan to see if the agency complied--this year, the agency updated the 6 components and for some components just put "no changes."

**SCHEDULE OF COMPLIANCE WITH 45 KAR 1:080 SECTION 4
YEAR ENDED JUNE 30, 1999 (CONTINUED)**

SUMMARY:

We reviewed each Title VI update and Implementation plan submitted by Federally funded agencies to determine if the agency was in compliance with the requirements of 45 KAR 1:080 and KRS 344.015. All agencies receiving Federal funds for fiscal year 1999 submitted Title VI plans/updates. In reviewing the Title VI information submitted by the agencies, we found the following:

45 KAR 1:080 Requirement	Number Of Problems In Requirement Area
1	7
2	2
3	9
4	9
5	6
6	8
7	17
8	7
9	5
10	16
11	12
12	15
13	16

CONCLUSION and RECOMMENDATIONS:

The Title VI Implementation plans and/or updates submitted by agencies receiving federal funds have been examined for compliance with 45 KAR 1:080. In performing this test, numerous noncompliances were noted for the thirteen reporting requirements under the above mentioned regulation. We determined a noncompliance/discrepancy

- (1) to be anytime the provisions of the reporting requirements were not fully met,
- (2) cases in which an update was sent noting that there were "no changes" without breaking it down by section, or
- (3) when the Title VI Compliance Status Report" was sent instead of the Title VI update and/or Implementation plan.

These noncompliances should be corrected and the proper updates made in the Title VI update for FY 00.

**AGENCIES RECEIVING FEDERAL FUNDS AND DATE PLAN/UPDATE
RECEIVED BY THE AUDITOR OF PUBLIC ACCOUNTS**

**AGENCIES RECEIVING FEDERAL FUNDS AS OF JUNE 30, 1999 AND DATE
PLAN/UPDATE RECEIVED BY THE AUDITOR OF PUBLIC ACCOUNTS**

Per KRS 344.015 (2) (c), each state agency shall: “Submit annual Title VI compliance reports and any implementation plan updates to the Auditor of Public Accounts and the Human Rights Commission by July 1, 1995, and each July 1 thereafter.”

Agency Receiving Federal Funds As Of June 30, 1999	Date Plan, Update, or Report Received
General Government Cabinet Department of Agriculture Department of Alcoholic Beverage Control Office of the Attorney General (OAG) Unified Prosecutorial System Office of the Governor Kentucky Commission on Human Rights Kentucky Council on Postsecondary Education Department for Local Government Department of Military Affairs	 07/01/1999 08/19/1999 07/14/1999 NA-Adopted OAG's Plan 07/01/1999 07/01/1999 07/01/1999 06/29/1999 06/28/1999
Cabinet For Economic Development Department of Community Development	 06/16/1999
Education, Arts and Humanities Cabinet * Department of Education Kentucky Educational Television Kentucky Arts Council Kentucky Center for the Arts Kentucky Heritage Council Kentucky Historical Society Department for Libraries and Archives	 07/01/1999 07/12/1999 07/08/1999 06/16/2000 06/25/1999 04/17/2000 06/24/1999
Finance and Administration Cabinet Kentucky Infrastructure Authority Thomson-Hood Veterans Center Department for Administration, Division of Surplus Property Office of the Controller Kentucky Higher Education Assistance Authority Kentucky Higher Education Student Loan Corp Kentucky Housing Corporation	 07/01/1999 Adopted Cabinet Plan Adopted Cabinet Plan Adopted Cabinet Plan 06/30/1999 06/15/1999** 06/29/1999
Cabinet for Families and Children	 06/27/1999

*The agencies of the Education, Arts, and Humanities Cabinet listed above, adopted the Cabinet’s Title VI Plan, but each agency submitted Title VI plan updates.

**The agency revised the implementation plan update submitted on June 14, 1999 with the implementation plan update submitted July 19, 1999.

**AGENCIES RECEIVING FEDERAL FUNDS AS OF JUNE 30, 1999 AND DATE
PLAN/UPDATE RECEIVED BY THE AUDITOR OF PUBLIC ACCOUNTS
(CONTINUED)**

Cabinet for Health Services Commission for Children with Special Health Care Needs	05/15/2000 NA-Adopted Cabinet's Plan
Justice Cabinet Department of Corrections Department of State Police Department of Juvenile Justice	06/30/1999 Adopted Cabinet Plan Adopted Cabinet Plan Adopted Cabinet Plan
Labor Cabinet	03/30/1999
Natural Resources and Environmental Protection Cabinet	07/22/1999
Public Protection and Regulation Cabinet Crime Victims Compensation Board Dept of Housing, Buildings, and Construction Dept of Mines and Minerals Dept of Public Advocacy Public Service Commission	04/13/2000 NA-No FY99 Fed Funds 04/29/1999 04/27/2000 06/24/1999
Revenue Cabinet	07/10/1999
Tourism Development Cabinet Department of Fish and Wildlife Resources Department of Parks Department of Travel	05/07/1999 Adopted Cabinet Plan NA-No FY99 Fed Funds Adopted Cabinet Plan
Transportation Cabinet	06/30/1999
Workforce Development Cabinet	07/01/1999

The Auditor of Public Accounts received a total of 33 Title VI implementation plans and updates from agencies listed on the fiscal year ended June 30, 1999 Schedule of Expenditures of Federal Awards. Of the 33 received, 26 were received before, on, or within two weeks after the due date of July 1, 1999 and 7 were received more than two weeks after the July 1, 1999 due date.

**CIVIL RIGHTS NONCOMPLIANCE FROM THE STATEWIDE SINGLE
AUDIT REPORT FOR THE YEAR ENDED JUNE 30, 1996**

CIVIL RIGHTS NONCOMPLIANCE FROM THE STATEWIDE SINGLE AUDIT REPORT FOR THE YEAR ENDED JUNE 30, 1996

The following noncompliance was cited in the Statewide Single Audit Report of the Commonwealth of Kentucky for the year ended June 30, 1996 and repeated in the *Report on Compliance With Civil Rights Laws Including Agency Title VI Implementation Plans, Updates, and Compliance Reports* for the year ended June 30, 1998. Since the fiscal year 1996 noncompliance finding was not resolved by June 30, 1998, the finding has been repeated below. Management's Response appears below the finding. The Current Status of the Finding follows Management's Response.

Finding, Management Response, and Current Status of Finding

NONCOMPLIANCE

The Cabinet for Health Services (CHS) was not in compliance with certain Title VI requirements as set forth in 45 KAR 1:080.

- CHS did not have an agency-wide compliance review instrument.
- The standard Title VI annual update due July 1, 1996, included only one of the required six sections.

45 KAR 1:080, Section 1(5) requires that a compliance review instrument be developed by the agency, such as a self-survey, assessment checklist, pre-award, routine enforcement plan, along with the criteria for selecting and scheduling reviews.

45 KAR 1:080, Section 4 requires the federal Title VI implementation plan contain the information prescribed by the section in succinct and concise language. Subsections (6), (7), (9), (10), (12), and (13) of this section shall be updated annually.

Management Response and Corrective Action Plan

The Cabinet for Health Services' initial plan has been revised to correct deficiencies assigned by your office. The plan updates subsections (6), (7), (9), (10), (12) and (13) as required by 45 KAR 1:080.

Response Provided By:

Clyde Bolton, Executive Director, Office of Program Support

Current Status of Prior Years Findings

Our audit shows this finding has been resolved.

GENERAL GOVERNMENT CABINET
DEPARTMENT OF AGRICULTURE



Billy Ray Smith
COMMISSIONER

OFFICE TELEPHONE
502-564-4696
FAX # 502-564-2133
TTY# 502-564-2075

COMMONWEALTH OF KENTUCKY
DEPARTMENT OF AGRICULTURE
7TH FLOOR, 500 MERO STREET
FRANKFORT, KENTUCKY 40601

June 30, 1999

The Honorable Edward B. Hatchett, Jr.
Auditor of Public Accounts
144 Capitol Annex
Frankfort, Kentucky 40601

Ms. Beverly Watts
Commission on Human Rights
The Heyburn Building, 7th Floor
332 West Broadway
Louisville, Kentucky 40202

Dear Auditor Hatchett and Ms. Watts:

Enclosed is the Department of Agriculture's Implementation Plan Update, and Compliance Status report for the period July 1, 1998-June 30, 1999. Also enclosed is a revised Title VI Implementation Plan reflecting the updates made.

Should your offices require additional information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Jamie Abbott".

Jamie Abbott
Title VI Coordinator

Title VI Implementation Plan Update

Kentucky Department of Agriculture

(July 1, 1998 - June 30, 1999)

VI. Programs and Activities Subject to Title VI

The Department of Agriculture's Title VI Implementation Plan has been updated with current federal contracts.

VII. Complaint Procedures/System

The Department of Agriculture's Title VI Implementation Plan was updated to include a copy of the *Complaint Under Title VI* and *Report of Investigation* forms.

The Department of Agriculture has received no complaints regarding Title VI compliance for the time period of July 1, 1998 - June 30, 1999.

IX. Training

New employees continue to receive Title VI information during orientation. Information will be distributed to all employees periodically.

The Department of Agriculture continues to implement a professional training program mandated for executive directors, directors, principal assistants, assistant directors, branch managers, and section supervisors. Training includes instruction in equal employment/affirmative action issues.

X. Goals and Evaluation Procedures

The Department of Agriculture's Title VI Implementation Plan was updated to include a copy of the *Title VI Annual Survey* form.

Annual surveys reporting Title VI compliance and needs were completed by executive staff members.

XII. Recordkeeping/Reporting

Annual surveys were completed by division directors and are on file in the Title VI Coordinator's office for auditing purposes. An annual compliance report was submitted to the Commissioner of Agriculture.

XIII. Minority Representation

The Department of Agriculture's Title VI Implementation Plan has been updated with current minority representation on advisory boards and agency staff.

Title VI Compliance Status
Kentucky Department of Agriculture
(July 1, 1998 - June 30, 1999)

		<u>Yes</u>	<u>No</u>
1.	Services from this facility are provided to clients without regard to race, color, or national origin.	X	
2.	An employee has been appointed to serve as Title VI Coordinator for this agency.	X	
3.	Minorities are represented on the advisory board if at least 5% of the population in the geographic service area are minority persons.		X
4.	A written procedure exists for hearing and reviewing Title VI complaints.	X	
5.	Records are maintained regarding all alleged cases of discrimination.	X	
6.	Title VI posters (where possible) are prominently displayed and used to emphasize the Title VI program and complaint opportunities.	X	
7.	New employees are clearly informed about their responsibilities to clients under Title VI.	X	
8.	Contracts between this agency and another party include the formal Title VI "Statement of Compliance" clause.	X	
9.	Other parties which contract with this agency are clearly informed by this agency about their own responsibilities to clients under Title VI standards.	X	
10.	All physical facilities and physical areas are made available to every client without regard to race, color, or national origin.	X	

Title VI

Commonwealth of Kentucky
Department of Agriculture

Billy Ray Smith
Commissioner

*Prepared by:
Jamie Abbott
Title VI Coordinator
Kentucky Department of Agriculture
500 Mero Street, Room 729
Frankfort, Kentucky 40601*

Title VI Implementation Plan Kentucky Department of Agriculture

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- XII. Recordkeeping/Reporting
- XIII. Minority Representation

Title VI Implementation Plan

Kentucky Department of Agriculture

(Revised June 1999)

I. Glossary

No glossary needed.

II. Overview

Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000 (d)) states as follows:

No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

The mission of the Kentucky Department of Agriculture is to fully comply with Title VI for all federally assisted programs.

III. Scope

The mission applies to all divisions within the Kentucky Department of Agriculture.

Prohibited practices include:

denying any individual any services, opportunity, or other benefit for which he/she is otherwise qualified;

providing any individual with any service, or other benefit, which is different or is provided in a different manner from that which is provided to others;

subjecting any individual to segregated or separate treatment in any manner related to his/her receipt of service;

restricting an individual in any way in the enjoyment of services, facilities, or any other advantage, privilege or other benefit provided to others;

adopting methods of administration which would limit participation by any group of recipients or subject them to discrimination; or

addressing an individual in a manner that denotes inferiority because of race, color, or national origin.

IV. Responsible Official

- a. The official ultimately responsible for the department's compliance with Title VI is the Commissioner of Agriculture, a duly elected constitutional officer of the Commonwealth of Kentucky. The Commissioner of Agriculture, elected for the term January 1, 1996, to December 31, 1999, is:

Billy Ray Smith, Commissioner
Kentucky Department of Agriculture
Capitol Annex Building, Room 188
Frankfort, Kentucky 40601
502/564-5126

The Commissioner will appoint a Title VI Coordinator who will serve as his advisor concerning the responsibilities of Title VI. The Title VI Coordinator will be responsible for coordinating the Commissioner's efforts with the division directors. The Title VI Coordinator is:

Jamie Abbott, Coordinator
ADA, EEO, Title VI and Safety Programs
500 Mero Street, Room 729
Frankfort, Kentucky 40601
502/564-4696

- b. Each division director will be responsible for administering the compliance procedure for his/her respective division.

V. Statement of Assurances

- a. In order to assure compliance with Title VI, all department publications will include the following language:

The Department of Agriculture does not discriminate on the basis of race, color, national origin, sex, religion, age, or disability in employment or the provision of services and provides, upon request, reasonable accommodation including auxiliary aids and services necessary to afford individuals with disabilities an equal opportunity to participate in all programs and activities.

- b. Compliance assurances in the areas of Discrimination (Because of Race, Religion, Color, National Origin, Sex, Age or Disability); Discrimination (Because of Handicap/Disability); Lobbying Restrictions, Certification and Disclosure; Drug Free Workplace; Licensing Requirements; The Davis Bacon Act; and Civil Rights Compliance will be included in all Department of Agriculture contracts. The assurances will be signed by the Second Party and maintained on file within the Office of the General Counsel, Kentucky Department of Agriculture.

Contracts with the department are generally placed out for bid and governed by KRS Chapter 45A.

VI. Programs and Activities Subject to Title VI

The Department of Agriculture receives direct funding from fourteen federal cooperative agreements and indirect funding from two cooperative agreements. The United States Environmental Protection Agency awards one consolidated grant to the Division of Pesticides and includes the areas of Enforcement, Certification, and Special Programs. The Division of Pesticides also was awarded a Pesticides Record keeping grant by the United States Department of Agriculture (USDA). The Division of Horticulture was awarded a Rural Development grant by USDA. The Division of Animal Health has one grant, a Brucellosis Laboratory and Recordkeeping Program grant, from USDA. The Division of Regulation and Inspection was awarded two grants from USDA: Shell Egg Surveillance and Poultry Grading. USDA awarded the Division of Food Distribution three grants: Commodity Supplemental Feeding Program, Food Distribution State Administrative Expense Program, and Emergency Feeding Program. The Division of Market Research has three USDA grants: Farmers Market Coupon, Tobacco Alternative Crop, and Statistics and Postage. The Office for Environmental Outreach has one USDA grant: Purchase of Agricultural Conservation Easements (PACE). The Division of Value-Added Livestock, Poultry and Forage Promotion was awarded a Market News grant from USDA.

In addition to the above direct grants, USDA has two cooperative agreements with the Kentucky Department of Agriculture that result in indirect funding. There is an agreement managed through the Division of Market Research for the Grading of Fresh Fruits and Vegetables. In this grant, the state collects grading and inspection fees for the federal government, and reimburses the federal government for the program-related expenses. Funds in excess of the reimbursement are maintained by the state for state program administrative costs. The Rural Rehabilitation Student Loan Program is managed through the Division of Fiscal and Intergovernmental Management. In this program, federal government made the initial trust investment, and the program operates through interest earned from the investment and from interest on loans.

The Department of Agriculture complies with all federal grant regulations as outlined in the United States Office of Management and Budget Circular A-87. The Kentucky Department of Agriculture has additional policies and procedures in place pertaining to the Drug Free Workplace and Non-discrimination Practices.

VII. Complaint Procedures/System

Complaints must be filed in writing by the complainant or by his/her representative. An official complaint form is available from the Title VI Coordinator and division directors, and should be utilized. The complaint must be filed within 30 calendar days after the alleged discrimination occurred. A copy of the *Complaint Under Title VI* form is attached.

The Title VI Coordinator has the responsibility of acknowledging receipt of complaints, investigating, reporting the findings, enforcement, and follow-up.

A complaint may be submitted to the respective division director, the Title VI Coordinator appointed by the Commissioner, the Kentucky Human Rights Commission, or the United States Department of Health and Human Services. Persons with a complaint against the Department of Agriculture are encouraged to first seek resolution through an internally filed complaint.

If submitted internally within the department, the employee receiving the complaint has the responsibility of immediately reporting the complaint to the Title VI Coordinator, who should begin an immediate investigation and report the complaint to the Commissioner. The investigation should include, at a minimum, discussing the complaint with the complainant, the alleged offender, and any witnesses. The report should include any recommendations for remedial action. This investigation should be completed within 60 days. A copy of the *Report of Investigation* form is attached.

The Title VI Coordinator should report her findings to the Commissioner. The Commissioner should review this report and make a final determination. This decision is a final decision of the agency.

If a complainant is dissatisfied with the findings of the department, he/she may appeal to the United States Department of Health and Human Services. This agency requires a complaint to be filed within 180 calendar days after the alleged discrimination occurred. It is necessary that the complaint be filed with the department within 30 days so that the department can investigate within 60 days and allow the complainant adequate time to appeal externally to the United States Department of Health and Human Services.

If a complaint is filed with both the United States Department of Health and Human Services and internally within the department, the department-level investigation will be suspended pending outcome of the federal complaint.

VIII. Compliance/Non-Compliance

For the purpose of monitoring compliance activities, the Title VI Coordinator will meet at least once a year with division directors to review the prior year's activities. Meetings will focus on Title VI education, complaints, and compliance. Division directors will complete an annual survey of monitoring activities. The Title VI Coordinator will review the annual surveys, and make a report to the Commissioner of the department's compliance with Title VI and any corrective action that should be taken.

IX. Training

Information will be distributed to all employees periodically to apprise staff of their responsibilities according to Title VI. The Title VI Coordinator will conduct training on an as-needed basis, or when required by an employee or division.

All new employees will receive information concerning Title VI during orientation.

X. Goals and Evaluation Procedures

The goal of the Department of Agriculture with regard to Title VI compliance is to afford all individuals an equal opportunity to participate in federally-assisted programs and to benefit equally from those programs.

Division directors will complete an annual survey of their respective division's monitoring activities. The survey will identify compliance with agency training, minority representation, and planning. A copy of the *Title VI Annual Survey* form is attached.

The Title VI Coordinator will review the annual surveys, and make a report to the Commissioner of the department's compliance with Title VI and any corrective action that should be taken. Corrective actions shall be undertaken as soon as reasonably possible.

XI. Public Notification/Outreach

Posters will be placed in all Department of Agriculture divisions to inform the public of the department's compliance with Title VI.

All pamphlets, newsletters, publications, etc., will have a clause informing the public of its compliance with Title VI.

XII. Recordkeeping/Reporting

Records of all complaints and their resolution will be kept for a period of ten (10) years by the Title VI Coordinator. The Title VI Coordinator will submit an annual Title VI compliance report, including any updates or changes to this plan, to the Commissioner of Agriculture. The report will discuss specific complaints, the activities of the Title VI Coordinator during the past year, the status of subrecipient compliance plans, and summarize Title VI compliance and enforcement data. Yearly reports are to be retained indefinitely. All records will be maintained on file in the Title VI Coordinator's office for auditing purposes.

XIII. Minority Representation

Council on Agriculture

The Council on Agriculture consists of 18 members appointed by the Commissioner of Agriculture pursuant to KRS 247.417. There is no minority representation on this council. The Commissioner will search for qualified minority applicants to serve on this council.

Egg Board

The Egg Board consists of six (6) members appointed by the Governor pursuant to KRS 260.570. There is no minority representation on this board. The Commissioner will recommend qualified minority individuals for appointment by the Governor as terms expire.

Food Distribution Advisory Council

The Food Distribution Advisory Council consists of 12 members. Food service directors from the nine (9) distributor regions in the state nominate and vote on individuals to serve on the council. There is no minority representation on this council. The Division of Food Distribution will encourage all eligible food service directors to seek election to the council and will address the requirements and terms of council members at all state and regional meetings.

Grain Insurance Corporation Board

The Grain Insurance Corporation Board consists of ten (10) members pursuant to KRS 251.600. There is no minority representation on this board. The Commissioner of Agriculture will consider qualified minority individuals for the six (6) positions he appoints as terms expire.

Grape Advisory Board

The Grape Advisory Board consists of six (6) members appointed by the Governor pursuant to Executive Order 95-692. There is no minority representation on this board. Names of qualified minority individuals will be submitted as vacancies occur.

Kentucky Agriculture and Environment in the Classroom

The Kentucky Agriculture and Environment in the Classroom Board consists of 20 members nominated by board members and interested organizations. There is no minority representation on this board. The board will consider qualified minority individuals.

Local Agriculture Fair Board

The Local Agriculture Fair Board consists of ten (10) members pursuant to KRS 247.220. There is no minority representation on this board. The Department of Agriculture has no influence in the selection of board members.

Market Development Advisory Board

The Market Development Advisory Board consists of 116 members appointed by the Commissioner of Agriculture pursuant to Administrative Order 98-03. There is one (1)

minority member on this board. The Commissioner of Agriculture will seek qualified minority individuals for appointment as vacancies occur.

Pest Control Advisory Board

The Pest Control Advisory Board consists of seven (7) members pursuant to KRS 217B.505. There is no minority representation on this board. The Commissioner of Agriculture will consider qualified minority individuals for the three (3) positions he appoints as terms expire.

Purchase of Agricultural Conservation Easements (PACE) Corporation Board

The Governor pursuant to KRS 262.906 appoints the Purchase of Agricultural Conservation Easements Corporation Board. The Department of Agriculture has no influence in the selection of board members.

State Board of Agriculture

The State Board of Agriculture consists of 14 members: Ten (10) citizens of the Commonwealth appointed by the Governor, Commissioner of Agriculture, State FFA President, State 4-H President, and the State Young Farmers President. There is no minority representation on this board. The Department of Agriculture has no influence in the selection of board members.

Agency

The Department of Agriculture has 351 employees, 11 of which are minorities. The department will consider qualified minority individuals when filling vacancies.

Kentucky Department of Agriculture
500 Mero Street, 7th Floor
Frankfort, Kentucky 40601
Voice: 502/564-4696
TTY: 502/564-2075
FAX: 502/564-2133

Complaint Under Title VI
The Civil Rights Act of 1964

Title VI Coordinator:

I, _____, hereby file an official complaint against
_____ (name of person or agency)
located at _____
_____.

Date of Alleged Discrimination: _____

Complainant's Name: _____

Complainant's Work Address: _____

Complainant's Work Phone: _____

Basis of Complaint (race, color, national origin):

Signed: _____

Date: _____

Kentucky Department of Agriculture
500 Mero Street, 7th Floor
Frankfort, Kentucky 40601
Voice: 502/564-4696
TTY: 502/564-2075
FAX: 502/564-2133

Report of Investigation
Complaint Under Title VI
The Civil Rights Act of 1964

I, _____, representing the Kentucky Department of Agriculture,
have investigated the complaint filed on _____ (date) by
_____ (name of complainant)
alleging that discrimination occurred which was in violation of the provisions of Title VI of the
Federal Civil Rights Act.

The result of the investigation is as follows:

- _____ The agency or person was found to be in violation of Title VI.
- _____ The agency or person was not found to be in violation of Title VI.
- _____ The complainant withdrew the complaint.

(Attach a copy of the investigative report.)

If the agency or person was found to be in violation of Title VI, a brief description of the
remedial action taken to assure future compliance follows:

Signed: _____

Date: _____

Kentucky Department of Agriculture
500 Mero Street, 7th Floor
Frankfort, Kentucky 40601
Voice: 502/564-4696
TTY: 502/564-2075
FAX: 502/564-2133

Title VI Annual Survey

Survey Date: _____

Division: _____

Summary of Complaints

Number of complaints: _____

Number resolved: _____

Number pending: _____

Agency Training

Is Title VI information prominently displayed in the organization and on any program materials distributed?

Yes _____ No _____

Are new employees informed of their specific responsibilities to applicants/participants under Title VI?

Yes _____ No _____

Are staff members periodically re-oriented or refreshed on information detailing their Title VI responsibilities?

Yes _____ No _____

Do all contracts to provide direct services to participants contain a Title VI statement of compliance?

Yes _____ No _____

Minority Representation

Name of advisory group or board: _____

What is the racial composition of the advisory group or board:

Total _____ White _____ Non-white _____

How are members selected?

What is the length of term members serve on the advisory group or board?

What steps will be taken to obtain minority representation on the advisory group or board?

Planning

Identify improvements you plan to implement before the next self-survey to better support Title VI communication to employees and program applicants.

Identify any problems encountered with Title VI compliance.

Signed: _____

Title: _____

Date: _____

GENERAL GOVERNMENT CABINET
DEPARTMENT OF ALCOHOLIC BEVERAGE CONTROL

**TITLE VI PLAN
1999 UPDATE**

**CABINET FOR PUBLIC PROTECTION AND REGULATION
DEPARTMENT OF ALCOHOLIC BEVERAGE CONTROL
EFFECTIVE 01-01-95
REVISED 08-09-99**

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I. PURPOSE AND/OR MISSION STATEMENT

The purpose of the Civil Rights Act of 1964, Title VI, is to assure that ..."No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

The Department of Alcoholic Beverage Control will continue to assure that any and all services provided by employees of the agency will be made fully available to all individuals, regardless of race, color or national origin.

II. SCOPE

Senate Bill 248, passed by the 1994 Regular Session of the Kentucky General Assembly, and codified as KRS 344.015 required:

- 1) all state agencies to develop a Title VI implementation plan by January 1, 1995;
- 2) each agency to submit a copy of the plan to the Auditor of Public Accounts and the Human Rights Commission;
- 3) each agency to submit annual compliance reports and plan updates to the Auditor of Public Accounts by July 1 every year;
- 4) the Auditor of Public Accounts to audit, evaluate and report on agencies Title VI plans;
- 5) that plans be available for copying;
- 6) that audits should determine compliance with the law; and
- 7) that federal funds should be utilized for any costs incurred in implementing Title VI of the Civil Rights Act of 1964.

III. RESPONSIBLE OFFICIAL

The responsibility for overseeing the implementation, regulation, monitoring and enforcement of the Title VI plan for the Department of Alcoholic Beverage Control resides with the Commissioner of the Department, the Director of Administrative Services and the Directors of the Divisions receiving federal funding. The Director of Administrative Services is the primary agency contact and any and all inquiries relating to Title VI should be sent to the following address:

Department of Alcoholic Beverage Control
Division of Administrative Services
Current Director: Everett E. Thompson
1003 Twilight Trail, Suite A-2
Frankfort, KY 40601

The department will allocate the necessary staff and budgetary resources to assure programmatic access for all individuals, regardless of race, color or national origin. It is anticipated that up to five percent (5%) of the time of the Director and one additional employee will meet the needs of the plan.

IV. STATEMENT OF ASSURANCES

The Department of Alcoholic Beverage Control assures that every effort will be made to comply with Title VI of the 1964 Civil Rights Act. At this time there are no sub-recipients to monitor, as no federal funds are channeled to other entities.

V. EFFECTIVE DATE

Pursuant to Senate Bill 248, the provisions of this Title VI plan are effective January 1, 1995.

VI. PROGRAMS/ACTIVITIES SUBJECT TO TITLE VI

The Department's Teen Tobacco Enforcement Program currently receives federal funds through a cost-reimbursement contract with the U.S. Food and Drug Administration (FDA). These funds are used to reimburse the Department for costs incurred in providing investigative coverage of retail establishments that sell tobacco products and to determine compliance with Federal Regulation, 21 CFR Part 801. The Department is in its 2nd year contract period, which became effective 7/01/99 and runs through 6/30/2000.

The Department's Enforcement Division currently receives a grant from the Kentucky State Police Traffic Safety Branch. The grant monies are used to pay overtime hours worked by ABC Investigators working programs that address underage drinking. The Kentucky State Police receive this funding from the National Highway Traffic Safety Administration (NHTSA). This is the fourth year of the Department's involvement, which began in December 1995. The current contract expires September 31, 1999.

The Licensing Division currently does not receive federal assistance. This Division issues all malt beverage and distilled spirits licenses throughout the state of Kentucky.

The Division of Administrative Services currently does not receive federal assistance. This division provides fiscal, personnel and administrative support for the above listed programmatic divisions.

VII. COMPLAINT PROCEDURES/SYSTEM

Any individual alleging discrimination based on race, color or national origin has a right to file a complaint within 180 days of the alleged discrimination. All complaints, written or verbal, should be accepted. In the event a complainant refuses or is unable to put their allegations in writing, the complainant should be assisted in contacting the Department's Title VI Coordinator, Mr. Everett Thompson. Mr. Thompson will assist by reducing the elements of the complaint into writing. Forms are available from the agency coordinator, but the use of such forms are not required for acceptance of the complaint.

Complaints should contain the following information:

- 1) Name, address and phone number of complainant if known.
- 2) The location and name of facility providing the service.
- 3) The nature of the incident that lead to the complaint.
- 4) The basis of the complaint, i.e. race, color or national origin.
- 5) Name, address and phone number of the witness(es) or other individual(s) who may have knowledge of the event.
- 6) The date or dates on which the alleged discriminatory event or events occurred.

Complaints received by the Department will be processed as follows:

- 1) All complaints received by the Agency Coordinator shall be forwarded to the Agency General Counsel.
- 2) The Agency General Counsel shall send the complainant a letter acknowledging receipt of the complaint, and shall attempt to set a time for either a telephone conversation or a meeting to discuss the events of the complaint.
- 3) Within ninety (90) days of receipt the General Counsel will conduct a preliminary inquiry to substantiate or refute any and all allegations, and report in writing the results of this preliminary inquiry.
- 4) If the allegations in the complaint are not substantiated, the complainant will be notified and informed how the determination was made. The notice should also inform the complainant of avenues to pursue the complaint beyond the agency.
- 5) If the preliminary inquiry indicated that there may be a problem, then a full investigation should be initiated. Any program found in violation of Title VI will be immediately changed to assure programmatic access regardless of race, color or national origin.

VIII. COMPLIANCE/NONCOMPLIANCE

The Department currently has neither sub-recipients nor sub-grantees. To assure compliance of all programs operated within the Department of Alcoholic Beverage Control (see Section VI), an annual self-evaluation will be conducted. The self-evaluation will examine all facets of the programs offered through the agency. Any instance in which the self-evaluation results in a determination that violations may exist will be followed by a full investigation by the agency coordinator. Full records and reporting will be maintained regarding such evaluations and investigations. The records will include resolution, enforcement, corrective action(s), and set a schedule for more frequent than annual monitoring.

IX. TRAINING

The Department of Alcoholic Beverage Control will provide written notice to all current employees concerning the agency's commitment to assuring compliance with Title VI by seeing that all programs are equally accessible regardless of race, color or national origin. A module will also be added to the agency orientation package for new employees. Should additional training become available, the agency coordinator will attend, and pass the benefit of the training on to pertinent staff members.

X. GOALS AND EVALUATION PROCEDURES

The Department of Alcoholic Beverage Control's agency coordinator will ensure that the agency, as well as any future sub-recipients, continue to be in compliance with Title VI by periodically gathering data on the following types of information:

- The manner in which services are provided by the program;
- The color, race, and national origin statistics relating to the segment of the population served;
- Program employment data;
- A review of existing and proposed facilities to assure there is nothing to adversely effect the provision of services to the interested population - regardless of race, color and/or national origin;
- A review of minority membership on planning and/or advisory bodies of any future potential sub-recipients.

The data gathering may include both research and field reviews.

XI. PUBLIC NOTIFICATION/OUTREACH

The Department of Alcoholic Beverage Control, as well as any future sub-recipients, will take positive and specific actions to advise and inform the public about all available services and about their rights under Title VI. As part of the compliance procedures, the Department will display posters and other literature stating program compliance with Title VI. Civil rights requirements will be incorporated in all guidelines, and information on Title VI will be made available to the public. All published program information will include a statement that the program is available to all without regard to race, color or national origin.

XII. RECORDKEEPING/REPORTING

The agency coordinator will prepare an annual summary of monitoring activities and compliant processing. In the future, should funds be distributed to sub-recipients, an annual report of that entity will also be acquired. The Department will compile, and submit upon request, a list of all complaints against programs, all instances of probable non-compliance with Title VI.

XIII. MINORITY REPRESENTATION ON PLANNING AND/OR ADVISORY BOARDS

The Alcoholic Beverage Control Board is part of the Commissioner's Office. There are three members appointed by the Governor of Kentucky. At this time there are no minorities represented on the Board.

The staff of the Department of Alcoholic Beverage Control is currently sixty-one (61) employees. This includes four (4) minorities, 6.6%, as defined by Title VI. The goal of the Department, Cabinet and Executive Branch of Kentucky State Government is to have 7.4% of our workforce comprised of minorities. The agency continues to attempt to identify, test and employ qualified minority applicants.

XIV. GLOSSARY/DEFINITION OF COMMON TERMS

- **Compliance:** The fulfillment of the requirements of Title VI, other applicable laws, implementing regulations, and instructions to the extent that no distinctions are made in the delivery of any service or benefit on the basis of race, color or national origin.
- **Complaint:** A verbal or written allegation of discrimination that indicated that a federally assisted program is operated in such a manner that it results in disparity of treatment to persons or groups of persons because of race, color or national origin.
- **Discrimination:** To make a distinction between one person or group of persons and others, either intentionally, by neglect, or by the effect of actions or lack of actions based on race, color or national origin.
- **Federal Assistance:** Any Federal funding, property, or aid provided for the purpose of assisting a beneficiary.
- **Minority:** A person or group of persons differing from others in some characteristic(s) who may be subjected to differential treatment on the basis of race, color or national origin.
- **Noncompliance:** Failure and/or refusal to comply with Title VI of the Civil Rights Act of 1964 or other applicable civil rights laws.
- **Sub-recipient:** Any public or private entity to whom federal financial assistance is tendered, through a grantee or recipient, for any program.

1999 TITLE VI COMPLIANCE STATUS

NAME OF AGENCY/FACILITY

Alcoholic Beverage Control
1003 Twilight Trail, Suite A-2
Frankfort, KY 40601
(502) 564-4850

		<u>YES</u>	<u>NO</u>
1.	Services from this facility are provided to clients without regard to race, color, or national origin.	X	
2.	An employee has been appointed to serve as Title VI Local Coordinator for this agency/facility.	X	
3.	Minorities are represented on the advisory board. *		X
4.	A written procedure exists for hearing and reviewing Title VI complaints.	X	
5.	Records are maintained regarding all alleged cases of discrimination.	X	
6.	Title VI posters (where possible) are prominently displayed and used to emphasize the Title VI program and complaint opportunities.	X	
7.	New employees are clearly informed about their responsibilities to clients under Title VI.	X	
8.	Contracts between this agency and another party include the formal Title VI Statement of Compliance clause.	X	
9.	Other parties which contract with this agency are clearly informed by this agency about their own responsibilities to clients under Title VI standards.	X	
10.	All physical facilities and physical areas are made available to every client without regard to race, color, or national origin.	X	

* The Alcoholic Beverage Control Board is appointed by the Governor's Office.

Everett E. Thompson, Title VI Coordinator
Alcoholic Beverage Control

Date: August 9, 1999

GENERAL GOVERNMENT CABINET
OFFICE OF THE ATTORNEY GENERAL

July 13, 1999


Mr. Anthony Leachman
Assistant State Auditor
Office of the Auditor of Public Accounts
2439 US 127 South
Frankfort, KY 40601

Dear Mr. Leachman:

Please find enclosed the Office of the Attorney General Annual Title VI Compliance Report and Implementation Plan With Updates including the period of July 1, 1998 to June 30, 1999.

If you have any questions, please call me at 502-696-5616.

Sincerely,



Marea Meredith Vincent

Internal Policy Analyst Chief
Title VI Coordinator
Office of the Attorney General
Suite #34, Capitol Building
Frankfort, KY 40601

Enclosure

CC: Human Rights Commission, Louisville

COMMONWEALTH OF KENTUCKY
OFFICE OF THE ATTORNEY GENERAL

TITLE VI MANUAL

EFFECTIVE JANUARY 1, 1995

(Includes Updates from January 1, 1995 to June 30, 1999)

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**Overview: Duties and Organization of the
 Office of the Attorney General**

The Attorney General is the Chief Law Officer of the Commonwealth of Kentucky, and is charged with many duties which affect state and local government, the operation of boards and agencies, and the administration of criminal justice. Kentucky Revised Statutes (KRS) 15.020 describes some of these duties, but other provisions found in other statutes also apply. In essence, the Office of the Attorney General acts as a “law firm” for the Commonwealth, handling legal matters as directed by the Kentucky General Assembly or which fall under the Attorney General’s common law authority. More specifically, the Attorney General is empowered by the Constitution and by statute to:

- * Represent the Commonwealth in all criminal and civil appeals
- * Issue opinions regarding state laws and government
- Attend to all legal actions involving the Commonwealth as a defendant, plaintiff, or prosecutor
- * Protect the public interest by promoting and enhancing the enforcement of the laws of the Commonwealth
- * Provide legal counsel to state agencies and boards and the officers of those entities
- * Provide investigative and trial services to prosecutors throughout the Commonwealth
- * Enforce the law as they relate to fraud and general crime

The Office of the Attorney General is organized at the present time into the following divisions:

**Administrative Hearings
Administrative Services
Child Support Enforcement Commission
Civil and Environmental Law
Consumer Protection
Criminal Appellate
Financial Integrity Enforcement
Medicaid Fraud and Abuse Control
Office of Rate Intervention
Prosecutors Advisory Council
Public Corruption
Senior Protection
Special Investigations
Special Prosecutions
Victims Advocacy**

Because of the subdivision of the Office of the Attorney General into specific areas of legal authority, and because the Office of the Attorney General is usually only responsible for enforcement of state law, federal money is not utilized for general office operations, except for the indirect cost allocation plan approved by the Federal cognizant agency. However, the Medicaid Fraud and Abuse Control Division is supported primarily by federal money, as is the Financial Integrity Enforcement Division of the Special Investigations Division. Funding of these activities is by annual agreement, with the Commonwealth of Kentucky providing a matching share. In addition, some federal grant money is received in other divisions for specific projects.

These grants vary from year to year, have limited scope, and any federal money received must be used as stated in the grant application. On some occasions, the Office of the Attorney General acts as a conduit for grant money which has been individually applied for and will be utilized by local prosecutors.

The Office of the Attorney General takes its responsibilities under Title VI of the Civil Rights Act of 1964 seriously and welcomes this opportunity to reaffirm its compliance with the goals of this historic legislation.

I. Mission Statement

The Office of the Attorney General reaffirms its policy to afford all individuals the opportunity to participate in federal financially assisted programs and to benefit equally from those programs. In furtherance of this goal, the following statement is adopted:

No person shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity of the Office of the Attorney General receiving federal financial assistance.

For purposes of this policy all programs, activities, investigations, and the performance of any official duty of this Office subject to Title VI shall be administered and conducted in accordance with this mission statement. This policy shall be implemented through the procedures for regulating , monitoring, and enforcing federal law as defined by this plan.

II. Scope

A. Legal Authority

The legal authority for adoption of the policies and procedures found in this policy manual are contained in Title VI of the Civil Rights Act of 1964, codified at 42 U.S.C. §2000d, in KRS 344.015, and in the constitutional and statutory authority of the Attorney General to establish policies and procedures for the Office of the Attorney General. See KRS 15.10; Kentucky Constitution §§91, 92, 93.

B. Specifically Prohibited Discriminatory Practices

Discriminatory practices based upon race, color or national origin are forbidden. No employee of the Office of the Attorney General shall:

- deny any individual or group a service, or other benefit for which the individual or group is otherwise qualified;
- provide any individual or group with any service, or other benefit, which is different or is provided in a different manner from that which is provided to others under the program;
- subject any individual or group to segregated or separate treatment in any manner related to receipt of service;
- restrict an individual or group in any way in the enjoyment of services, facilities or any other advantage, privilege or other benefit provided to others under the program;
- adopt methods of administration which would limit participation by any individual or group of recipients or subject them to discrimination;
- address an individual or group in a manner that denotes inferiority because of race, color, or national origin.

C. Illustrations and Examples

In order to illustrate discriminatory practices under each of these subject areas, specific examples of discriminatory practice forbidden by Title VI are listed below. Although many of these specific examples are not applicable to the operations of the Office of the Attorney General, they are presented here to stimulate thought and discussion. To reiterate, it is against the policy of this Office for any employee to:

- Deny an individual any service, financial aid, or other benefit provided under the program.
Example: A black child is denied membership because of race in a local club which receives federal funds through the Department of Agriculture's Extension Services.
- Provide a service or benefit to an individual which is inferior (either in quantity or quality) to that provided to others in the program.
Example: A city's bus system, partially funded by federal money, routes new buses to areas where whites live and uses old buses, which break down more frequently and lack air conditioning, in predominately minority areas of the city.
- Provide an individual with a service or benefit in a manner different from others under the program.
Example: A local employment service, funded by the Department of Labor, routinely refers white high school graduates to clerical jobs; similarly qualified minority applicants are required to take a clerical skills test.
- Subject an individual to segregation in any manner related to the receipt of services or benefits under the program.
Example: The waiting room in a health clinic, receiving federal Medicaid and Medicare dollars, was once segregated by race with a partition. Although the partition has been removed, there are still separate doors and no attempt has been made to inform patients that they are not required to sit on their traditional side.
- Subject an individual to separate treatment in any manner related to receiving services or benefits under the program.
Example: A local welfare office run by the state, which receives federal money, requires Hispanic applicants and clients of limited English speaking ability to bring interpreters to interviews with their social workers.
- Restrict an individual in any way in the receipt of any advantage or privilege enjoyed by others under the program.
Example: Minority university students, although allowed entrance to the university in a non-discriminatory manner, find that the university's housing referral service steers them to segregated off-campus housing.
- Require different standards or conditions as prerequisites for accepting an individual into a program.

Example: In a federally assisted housing project, the developer requires minority applicants to have a better credit rating and higher base salary than white applicants; only minority applicants are required to submit personal references.

- Deny a person the opportunity to participate as a member of planning or advisory body which is an integral part of the program.

Example: A planning council is established by the mayor of a city eligible for federal assistance. The mayor's appointees to the council were predominately white males, and representatives of minority community-based organizations, of demonstrated effectiveness in this area, were purposefully excluded from membership on the council.

- Utilize criteria or methods of administration which (a) have the effect of subjecting individuals to discrimination or (b) operate to defeat or substantially impair the accomplishment of the objectives of the program.

Example (a): A state department of social services fails to allocate its resources based on client load and need; this results in clients in a densely populated minority area routinely having long waits and dealing with overworked staff while another similarly staffed office in a low volume predominately white area is able to provide faster, more individual service.

Example (b): The training facilities used by a small community's vocational rehabilitation program are located outside the range of the community's public transportation system; the program provides no transportation for its clients. A disproportionate percentage of the program's drop-outs are minority trainees who lack adequate resources to provide their own transportation.

- Permit discriminatory activity in a facility built in whole or part with federal funds.

Example: A private recreation association receives a federal loan to construct a swimming pool; the use of the pool is limited to members of the association. The right to accept or reject membership rests entirely with the all white Board of Directors which has actively discouraged minority membership.

- Fail to provide services or information in a language other than English when significant numbers of potential or actual beneficiaries are of limited English speaking ability.

Example: A community, in assessing where best to spend federal funds, targets a predominately Hispanic neighborhood for improvements; residents of this area are known to generally lack English skills. However, none of the project's staff provided by the community to deal with the neighborhood planning committee speak Spanish.

- Fail to advise the population eligible to be served or benefitted by the program of the existence of the program.

Example: A city, which has traditionally hired predominately white employees, receives federal funds to administer a Public Service Employment program. The city depends primarily upon announcements in city hall and word of mouth to recruit applicants for the program.

- Locate a facility in any way which would limit or impede access to a federally funded service or benefit.

Example: A community allocates federal funds to build six new lighted tennis courts, but the courts were all built in parks located in predominately white areas which are not easily accessible to minority residents of that community.

Note, however, that Title VI does not cover all types of discrimination.
For example, Title VI

- Does not provide relief for discrimination based on age, sex, geographical locale or wealth.
- Does not apply to direct benefit programs such as Social Security.
- Does not apply to federal assistance provided through insurance or guaranty contracts. For example, FHA loans or insurance.
- Does not apply to employment, except where employment practices result in discrimination against program beneficiaries or where the purpose of the federal assistance is to provide employment.

III. Responsible Officials

Within the Office of the Attorney General, the overall responsibility for Title VI compliance is vested in the Attorney General, who is accountable for the administration of the Office of the Attorney General and all its organizational subdivisions.

The responsibility for coordinating, implementing, monitoring, and reporting under Title VI in the Office of the Attorney General is assigned to a Title VI Coordinator. The Title VI Coordinator is Malea Meredith Vincent, Suite 34, Capitol Building, Frankfort, Kentucky 40601, (502) 696-5616.

Division Directors within the Office of the Attorney General are responsible for administering compliance procedures and for initial processing of Title VI complaints involving their respective divisions.

IV. Statement of Assurances

The Office of the Attorney General, its employees, and all subrecipients of federal funding from the Office of the Attorney General shall comply with Title VI.

The Title VI plans for all subrecipients of funding from the Office of the Attorney General shall be kept on file and made available for review by contacting Malea Meredith Vincent, Title VI Coordinator, Room 34, Capitol Building, Frankfort, Kentucky 40601, (502) 696-5616.

V. Effective Date

January 1, 1995, is the effective date of this Title VI implementation plan. At present, no updates to this plan are proposed or in progress.

UPDATE: January 1, 1995 to June 30, 1995

Update is included in updated manual.

UPDATE: July 1, 1995 to June 30, 1996

Update is included in updated manual.

UPDATE: July 1, 1996 to June 30, 1997

Update is included in updated manual.

UPDATE: July 1, 1997 to June 30, 1998. Update is included in updated manual.

UPDATE: July 1, 1998 to June 30, 1999. Update is included in updated manual.

VI. Programs or Activities Subject to Title VI

Federal funding is received by the Office of the Attorney General for the following program areas:

Medicaid Fraud and Abuse Control Division

This division of the Office of the Attorney General receives a federal matching grant from the United States Department of Health and Human Services to investigate and prosecute Medicaid fraud and abuse. All expenditures of grant funds are stipulated in the grant application which is renewed annually. There are no subrecipients of federal funds under this grant, and no direct beneficiaries among the general public.

Special Investigations Division/Financial Integrity Enforcement Division

Special Investigations contracts with the state Cabinet for Families and Children to perform program monitoring of possible fraud and abuse in the Cabinet's assistance programs as required by federal agencies. Responsibility for investigation and prosecution of welfare fraud rests with the Office of the Attorney General. The contract itself, which is renewed annually, expressly prohibits discrimination based on race, religion, color, national origin, sex or age in the performance of the contract. There are no subrecipients of federal funds under this agreement, and no direct beneficiaries among the general public. The Division of Financial Integrity Enforcement also received Federal matching funds from the United States Department of Agriculture through the Cabinet for Families and Children on the State Law Enforcement Bureau (SLEB) for Food Stamp Trafficking Enforcement and Prosecution.

Kentucky Statistical Analysis Center

The Kentucky Statistical Analysis Center (SAC) is operated by the Office of the Attorney General as a centralized clearinghouse for gathering and disseminating statistics on the Kentucky criminal justice system. SAC has applied for and received a federal grant from the Federal Bureau of Justice Statistics to study school violence. The title of the grant is "Communities in the Aid of Children." The grant project is being conducted by Eastern Kentucky University in Richmond, KY. Eastern Kentucky University is the subrecipient of this grant and has acknowledged they will comply with the OAG statement of compliance relating to Title VI.

UPDATE: January 1, 1995 to June 30, 1995

There is one subrecipient of federal funding through this program grant, which is the Jefferson County Attorney's Office, Michael E. Conliffe, County Attorney. A copy of the contract agreement is available for review from the Office of the Attorney General Title VI Coordinator.

UPDATE: July 1, 1995 to June 30, 1996

There was no funding for Fiscal Year 1995-1996.

UPDATE: July 1, 1996 to June 30, 1997

There was no Federal funding for Fiscal Year 1996-1997.

UPDATE: July 1, 1997 to June 30, 1998

Federal funding was received for a Prescription Drug study. Update and details are listed in previous section. SAC applied for and received a federal grant from the Federal Bureau of Justice Statistics to study Prescription Drug Abuse among juveniles in the Commonwealth, as well as, victims of domestic violence. A task force was formed and a report issued. Legislation was passed and the SAC completed a final report. There are no subrecipients of federal funds under this grant, and no direct beneficiaries among the general public.

UPDATE: July 1, 1998 to June 30, 1999

Federal funding was received for a "Communities in Aid of Children", grant dealing with school violence. The study is being conducted by Eastern Kentucky University. A copy of the grant agreement is available for review in the Office of the Attorney General, Administrative Services Division, Suite 34, Capitol. Details are listed above.

Victims' Advocacy Division

This division is involved with federal funding from three sources. First the Office of the Attorney General, on behalf of Kentucky's Child Sexual Abuse and Exploitation Prevention Board, receives two Community Based Prevention Grants from the Kentucky Cabinet for Families and Children to further community-based child abuse prevention activities. From the 98 FY grant there are five subrecipients of federal funding through this grant, which are as follows:

SAFE Children Foundations, INC. P.O. Box 383, Owensboro, KY 42302
Center for Women & Families, 226 W. Breckinridge St., Louisville, KY 40203
Lincoln Heritage Council, BSA, 824 Phillips Lane, Louisville, KY 40209
Women's Crisis Center, 835 Madison Ave., Covington, KY 41011
Neighborhood House, 225 North 25th St., Louisville, KY 40212

From the 99 FY grant, there is one subrecipient of federal funding through this grant which is as follows:

"Growing Up Safe In Johnson County."

A copy of the grant agreements are available from the Office of the Attorney General, Victims' Advocacy Division. The second source of federal funding is as follows: In February 1997, the Victims Advocacy Division received federal funding from the U.S. Department of Justice through the Kentucky Justice Cabinet to provide Domestic Violence Prosecutors within the Office of the Attorney General to coordinate and consult with criminal justice practitioners, including all Kentucky prosecutors, victims' advocates, law enforcement officials and social services personnel on issues relating to the successful intervention in and prosecution of domestic violence, sexual assault and stalking cases. The emphasis of this grant is the development and implementation of training and, where requested, on-site assistance in case investigation, preparation and prosecution. There are no subrecipients of federal funds under this grant, and no direct beneficiaries among the general public. The third source of federal funding is from the Office of Juvenile Justice and Delinquency Prevention and National Network of Children's Advocacy Centers. This grant is for \$5,000 and is a training grant to train local multi-disciplinary teams. There are no subrecipients of federal funds under this grant and no direct beneficiaries among the general public.

UPDATE: January 1, 1995 to June 30, 1995

The Victims Advocacy Division did not receive any federal funds from January 1, 1995 to June 30, 1995. There are no direct beneficiaries or subrecipients at this time.

UPDATE: July 1, 1995 to June 30, 1996

All instances where the Title of the Cabinet appear as Human Resources should be changed to Cabinet for Families and Children

UPDATE: July 1, 1996 to June 30, 1997

Actual update within text of Title VI Manual.

UPDATE: July 1, 1997 to June 30, 1998

Actual update within text of Title VI Manual.

UPDATE: July 1, 1998 to June 30, 1999

Actual update within text of Title VI Manual

Prosecutor's Advisory Council Division

Under Kentucky's Unified Prosecutorial System, the Prosecutor's Advisory Council (PAC) retains and disburses grant money applied for by local prosecutors. These funds currently include Criminal Justice Block Grants from the Department of Justice, Children's Justice Act grants from the Department of Health and Human Services, and an National Highway Traffic Safety Act grant from the Department of Transportation. The Office of the Attorney General is involved with these grant awards only insofar as the funds are received by PAC for distribution to the grant applicants. The grants are as follows:

Child Abuse Center Grant from the Cabinet for Families and Children

National Highway Traffic Safety Act Grant from DOT

VOCA-Victims OF Crime Act Grant, VAWA-Violence Against Women Grant and the Byrne Memorial Grant from the Kentucky Justice Cabinet and U.S. Department of Justice. A portion of the VAWA Grant also funds a part of the Annual Prosecutors Conference dealing with Domestic violence issues, etc.

In January 1997, The Prosecutors Advisory Council received federal funding from the U.S. Department of Justice through the Kentucky Justice Cabinet to create the instruments necessary to assess the effectiveness of the criminal justice system in Kentucky as it confronts child sexual abuse, and to lay the groundwork for solutions to the problems thus identified. The instrument central to this proposal is a reliable, extensive, significant and public body of data concerning the prosecutions of child sexual abuse cases. The broad, central objective of this proposal is to create a database with potential for forming criminal justice policy questions, identifying problem areas and providing direction for solutions to problems. The particular, concrete objectives are as follows: a database will be produced that allows us to address policy issues and problems such as those listed below:

- 1) Sentencing for sexual offenses against minors will be examined for readjustment in light of the actual practices;
- 2) The length of time from charging in cases to disposition will be examined to identify disparities and seek explanations for them;
- 3) Problem areas (defined in terms of sentencing, case disposition, charges, etc.) will be identified and explanations sought;
- 4) Child advocacy groups will be provided this information to assist them in targeting communities for education and awareness initiatives;
- 5) A report will be provided to the public in a readable format, addressing significant issues, that can serve to generate additional inquiries concerning the criminal justice system's handling of child sexual abuse cases.

There are no subrecipients of federal funds under this grant, and no direct beneficiaries among the general public.

UPDATE: January 1, 1995 to June 30, 1995

The National Highway Safety program was not an active grant during this period. When the National Highway Safety program resumes, it will be governed by the Justice Cabinet/Kentucky State Police.

UPDATE: July 1, 1995 to June 30, 1996

During this period PAC began administering the Statewide Highway Safety Task Force Grant funded by the Justice Cabinet/Kentucky State Police. Title VI certification for grants are available for review.

UPDATE: July 1, 1996 to June 30, 1997

During this period PAC continued to administer the Statewide Highway Safety Task Force Grant funded by the Justice Cabinet/Kentucky State Police. Other updated information is in the text section of the manual. Title VI certifications for grants are available for review.

UPDATE: July 1, 1997 to June 30, 1998

During this period PAC continued to administer the grants listed above as well as began administering the Byrne Memorial Grant for the Jefferson County Commonwealth Attorneys Office funded by the Justice Cabinet. PAC stopped the CFC grant on 10/01/97 due to a stop in funding. Other updated information is in the text section of the manual. Title VI certifications for grants are available for review.

UPDATE: July 1, 1998 to June 30, 1999

During this period PAC continued to administer the grants listed above as well as began administering the Byrne Memorial Grant for the Jefferson County Commonwealth Attorneys Office funded by the Justice Cabinet. Other updated information is in the text section of the manual. Title VI certifications for grants are available for review.

Criminal Appellate Division

In July 1995, The Criminal Appellate Division received federal funding from the U.S. Department of Justice through the Kentucky Justice Cabinet to provide for attorneys to work specifically to expedite death penalty post-conviction litigation. The goals of the program are 1) to decrease the percentage of Kentucky death penalty cases pending at the state post-conviction stage, and 2) increase the percentage of Kentucky death penalty cases reaching the federal courts. The division has applied to the Kentucky Justice Cabinet to renew this funding for the 1996-1997 grant year. There are no subrecipients of federal funds under this grant, and no direct beneficiaries among the general public.

UPDATE: July 1, 1996 to June 30, 1997

The division received continuation of the aforementioned Death Penalty Grant. The division has applied to the Kentucky Justice Cabinet to renew this funding for 1997-1998 grant year. There are no subrecipients of federal funds under this grant, and no direct beneficiaries among the general public.

UPDATE: July 1, 1997 to June 30, 1998

The division received continuation of the aforementioned Death Penalty Grant. The division has applied to the Kentucky Justice Cabinet to renew this funding for 1998-1999 grant year. There are no subrecipients of federal funds under this grant, and no direct beneficiaries among the general public.

UPDATE: July 1, 1998 to June 30, 1999

The Division receives federal funding as a subrecipient on a grant from the U.S. Department of Justice, through the Kentucky Justice Cabinet. This is currently the Division's only source of federal funding. Under this grant the Criminal Appellate Division has provided two attorneys to work specifically on expediting death penalty post-conviction litigation. Consequently, this Division has no "beneficiaries," as such, to which these funds are disbursed. However, all funds under this grant are utilized in conformance with Title VI, and all employees of the Division have been advised of Title VI requirements. This grant expired June 30, 1999.

Justice Resource Center Contract

The Office of the Attorney General contracted with the Justice Resource Center (no federal funds) for Fiscal Year 1998-2000 to provide assistance to the Finance and Administration Cabinet to increase minority participation in State government capital construction projects for the next biennium.

Child Support Commission

KRS 15.290, 1988 Acts of the General Assembly, effective May 1, 1988, relating to child support recovery, established a Child Support Enforcement Commission to be attached to the Office of the Attorney General, but the costs related to the functions of the Commission are to be reimbursed by the Cabinet for Families and Children and to the Department of Law (The Office of the Attorney General). The OAG receives funds from the Cabinet for Families and Children under Title IV of the Social Security Act to establish a Child Support Enforcement Commission. There are no subrecipients of federal funds under this grant and no direct beneficiaries among the general public. In addition, the Cabinet for Families and Children has contracted with the OAG to employ investigators to assist in child support activities. There is an ever increasing need for assistance in serving summons and for investigative activity for the purposes of establishing paternity, and establishing, enforcing and modifying child support obligations.

VII. Complaint Procedures

A. Filing a Complaint

A complaint that this agency, a subrecipient or any related party is in violation of Title VI may be made not later than 180 days from the date of the alleged discrimination, unless the time for filing is extended by the Deputy Attorney General for good cause shown. Complaints of employees should initially be made orally or in writing to their Division Director. Complaints filed by individuals or entities outside of the Office of the Attorney General may be referred directly to the Title VI Coordinator, who then acts as the agency official for initial processing of these complaints, or to such other individual as the Attorney General designates as the agency official for initial processing of these complaints.

A complaint shall provide specific facts upon which the complaint is based, and shall be signed and witnessed by a notary. If a complaint is given orally, the facts and nature of the complaint shall be reduced to writing by the Division Director or the agency official to whom the complaint is given, and then signed. The Division Director or agency official shall promptly acknowledge receipt of the complaint in writing and provide copies of the complaint and acknowledgment to the Title VI Coordinator and the Deputy Attorney General.

B. Initial Review

The Division Director or agency official shall promptly determine whether to investigate the complaint personally or to refer it to the Deputy Attorney General. No later than thirty days after receiving the complaint, the Division Director or agency official shall report in writing to the Deputy Attorney General and the Title VI Coordinator that: a) the complaint has been resolved, including findings of fact and providing a detailed description of how resolution was achieved; or b) the investigation is continuing, including activities already undertaken, preliminary findings, rationale for continuing the investigation and a scheduled timetable for completion; or c) the complaint can best be resolved by referral to another Division Director, another individual within the Office of the Attorney General or to an outside agency such as the Kentucky Commission on Human Rights.

C. Withdrawal of a Complaint

Any withdrawal of a complaint shall be in writing and signed by the individual filing the withdrawal. Withdrawal of a complaint is in the discretion of the Deputy Attorney General. The Office of the Attorney General shall determine whether withdrawal of this complaint is in the interest of Title VI compliance and whether the investigative report shall be completed.

D. Investigative Report

At the conclusion of the investigation, the investigator shall report, in writing, such findings of fact, conclusions and recommendations as may be appropriate to the Title VI Coordinator and the Deputy Attorney General.

E. Decision, Findings of Fact, and Issuance of Formal Decision

The Deputy Attorney General shall issue a formal decision, which may be accomplished by adopting the investigative report, modifying the investigative report, or issuing a new decision. The formal decision of the Office of the Attorney General shall contain such findings of fact, conclusions of law, and recommendations as may be appropriate. A copy shall be provided to the complainant, the Title VI Coordinator, and any affected employee, subrecipient or any related party.

F. Enforcement and Follow-up

Any subrecipient found to have violated the provisions of Title VI shall be given a written notice. Failure to eliminate further discrimination within thirty (30) days of receipt of the notice will be considered a violation of the terms of any contract or agreement and a basis for contract suspension, termination or rejection. The enforcement procedure by the Office of the Attorney General for termination of a contract agency from participation as a recipient of federal financial assistance will be in accordance with the enforcement procedure contained in 45 C.F.R. 80.9, 80.10, and 80.11. If a state employee is found to have engaged in any discriminatory practice based on Title VI provisions, the Office of the Attorney General may reprimand or take other disciplinary action as provided in KRS Chapter 18A.

G. Hearing and Appeals

An employee, subrecipient or other complainant who is aggrieved by the formal decision issued by the Office of the Attorney General may make a request, in writing, for reconsideration of the decision and to present further evidence. Such request shall be made no more than twenty (20) days after issuance of the formal decision, unless the time for filing is extended by the Deputy Attorney General for good cause shown. This section shall be updated annually.

VIII. Compliance Review

For the purpose of monitoring compliance activities, the Office of the Attorney General will maintain a working group comprised of the Title VI Coordinator and such other employees of the Office of the Attorney General as may be appointed. This group will meet at least once a year to review the prior year's activities. This yearly meeting will focus primarily on complaints filed during the year and other Title VI activities. The working group shall review and report on all federally funded programs at least annually, including the procedures used to assure subrecipient compliance, particularly where non-compliance has been reported or was the subject of prior investigation. The working group shall also follow-up on any resolved complaints to assure continuing compliance and to monitor corrective action(s). Any significant problems of general compliance, training and employee/subrecipient and public education will also be addressed. The investigation, work, findings, and recommendations of the working group shall be incorporated into the annual report of the Title VI Coordinator, or may be made directly to the Deputy Attorney General at any time.

IX. Training

In-service training programs for employees will continually apprise appropriate staff of their responsibility to render a high quality of services to all clients regardless of their race, color or national origin. Annual training for Division Directors in Title VI shall be offered and attendance required except for good cause shown. Subrecipients and beneficiaries (if any) shall be provided explanatory materials and technical assistance as necessary to ensure their knowledge of, and compliance with, the requirements of Title VI.

This section shall be updated annually.

UPDATE: July 1, 1995 to June 30, 1996

Employee Handbooks are being prepared for OAG employees. These will include a section on Title VI responsibility as to providing services and programs of the OAG to the Public regardless of race, color, or national origin.

UPDATE: July 1, 1996 to June 30, 1997

Employee Handbooks with Title VI information are available for employee review. Plans are being made to prepare a Fiscal Year 97-98 Mandatory Training List for Managers and Supervisors.

UPDATE: July 1, 1997 to June 30, 1998

Employee Handbooks with Title VI information are available for employee review. The OAG/EEO Committee implemented a series of mandatory training classes for management staff relating to discrimination issues. Class offered to date include:

Sensitivity Training, Disability Awareness, Ethics in the Workplace, Transitional Analysis, Communications, and EEO and You.

Additional classes will be offered during the upcoming year.

UPDATE: July 1, 1998 to June 30, 1999

Employee Handbooks with Title VI information are available for employee review. The OAG/EEO Committee offered a number of mandatory training classes for management staff relating to discrimination issues. Class offered to date include:

Team Building, Ethics in the Workplace, What Collar Do You Wear?, Employee Evaluation Training, KEAP, Sexual Harassment Prevention, Stress Management, Body Language, Active Listening, Sensitivity Training, Dealing With Conflict, Building a Bridge, Workforce Diversity, and Intro. To Critical Incident Stress.

Additional classes will be offered during the upcoming year.

X. Goals and Evaluation Procedures

As stated above, the goal of the Office of the Attorney General with regard to Title VI compliance, is to afford all individuals an equal opportunity to participate in federal financially assisted programs and to benefit equally from those programs. As applicable, Division Directors shall submit an annual report to the Title VI Coordinator specifically addressing the following Title VI compliance areas:

1. Whether all beneficiaries, regardless of race or national origin have been adequately informed of the availability of recipient services on an equal basis.
2. Whether different admission standards have been applied to certain applicants, either openly or under cover of reasonable educational, financial or other qualification.
3. Whether referrals have been made to subrecipients who discriminate.
4. Whether the services supplied have been furnished in a different way to some beneficiaries.
5. Whether recipients (divisions) and subrecipients have acknowledged implementation of all procedures and activities called for under the agency's published statement of compliance.
6. Whether employment practices (i.e., recruitment, hiring, promotions, assignments and training) have been without discrimination.
7. Whether any complaints alleging Title VI violations have been filed with regard to the division's operating practices and procedures.

Annual reports prepared by Division Directors will be submitted to the Title VI Coordinator and the working group for annual compliance review as set forth in Section VIII of this manual. This review will identify existing needs or deficiencies with regard to Title VI compliance, make recommendations for continued compliance, and specify any needed corrective procedures. Corrective procedures shall be undertaken as soon as reasonably possible.

XI. Public Notification

In order to further assure Title VI compliance the official publications of the Office of the Attorney General which are distributed to the public generally shall, if feasible, include the following formal statement of compliance:

No person shall on the grounds of race, color, national origin, sex, age or ability to pay, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity operated by the Office of the Attorney General, it being the intention of the Office of the Attorney General to bind all agencies, disbursing units, or organizations, operating under its jurisdiction and control to fully comply with and abide by the spirit and intent of the Civil Rights Act of 1964.

All materials relating to Title VI compliance shall be maintained by the Title VI Coordinator and will be available for distribution upon request.

UPDATE: January 1, 1995 to June 30, 1995

In order to further assume Title VI compliance the official publications of the Office of the Attorney General which are distributed to the public generally shall, if feasible, include the following formal statement of compliance:

(ADA/TITLE VI STATEMENT FOR PUBLICATIONS)

The Office of the Attorney General (OAG) does not discriminate on the basis of race, color, national origin, sex, religion, age or disability in employment or in the provision of services. The OAG provides, upon request, reasonable accommodation including auxiliary aids and services necessary to afford individuals with disabilities an equal opportunity to participate in all programs and activities.

The OAG intends that no person shall be excluded from participation in , denied the benefits of, or otherwise subjected to discrimination under any program or activity operated by the OAG. The OAG intends to bind all entities operating under its jurisdiction and control to fully comply with and abide by the spirit and intent of the Civil Rights Act of 1964.

Please notify Malea Meredith Vincent, OAG/ADA and Title VI Coordinator, Room 34, Capitol Building, Frankfort, KY 40601, (502) 696-5616 at any time to report discrimination. OAG Office hours are 8:00AM to 5:00PM.

(ADA/TITLE VI STATEMENT FOR ACTIVITIES)

The Office of the Attorney General (OAG) does not discriminate on the basis of race, color, national origin, sex, religion, age or disability in employment or in the provision of services. The OAG provides, upon request, reasonable accommodation including auxiliary aids and services necessary to afford individuals with disabilities an equal opportunity to participate in all programs and activities. The OAG intends that no person shall be excluded from participation in, denied the benefits of, or otherwise subjected to discrimination under any program or activity operated by the OAG. The OAG intends to bind all entities operating under its jurisdiction and control to fully comply with and abide by the spirit and intent of the Civil Rights Act of 1964.

Please notify Malea Meredith Vincent, OAG/ADA and Title VI Coordinator, Room 34, Capitol Building, Frankfort, KY 40601, (502) 696-5616 by (date) if an auxiliary aid or service such as an interpreter, is necessary for participation in this (specify "conference, program or activity"), or at any time to report discrimination. OAG Office hours are 8:00AM to 5:00PM.

XII. Recordkeeping/Reporting

Records of all complaints and their resolution shall be kept for a period of ten (10) years by the Title VI Coordinator. The Title VI Coordinator shall submit an annual Title VI compliance report, including any updates or changes to this plan, to the Attorney General. The report shall discuss specific complaints, the activities of the Title VI Coordinator and the working group during the past year, the status of subrecipient compliance plans, and shall summarize Title VI compliance and enforcement data.

Yearly reports are to be retained indefinitely. Compliance plans for subrecipients (if any) shall be retained and evaluated periodically by the Title VI Coordinator, but may be destroyed once an entity no longer is a subrecipient. This section shall be updated annually.

XIII. Minority Representation On Advisory Bodies

The Office of the Attorney General administers a number of Advisory Boards whose activities relate to specific divisions within the Office.

1) **Child Sexual Abuse and Exploitation Prevention Board.** This advisory board consists of certain public officials and ten (10) public members appointed by the Governor. The public members "shall be representative of the demographic composition of this state." KRS 15.910. At the present time, there is a minority representative appointed by the Governor or serving on this board. Coordination of this board is through the Victims Advocacy Division of the Office of the Attorney General.

2. **Statewide Multi-Disciplinary Commission on Child Sexual Abuse.** This commission has thirteen (13) members, including one (1) minority member. The Office of the Attorney General provides staff support. The Commission members are appointed by different Executive Branch Agency Heads pursuant to KRS.431.650.

3. **Child Support Enforcement Commission.** This advisory commission consists of certain listed public officials and five (5) at-large members appointed by the Governor. KRS 15.290. At the present time, one (1) minority member has been appointed by the Governor and is serving on the commission.

4. **Consumers' Advisory Council.** The Consumers' Advisory Council is a creation of the General Assembly pursuant to KRS36 7.120. There are 16 members appointed by the Governor. The Attorney General is an ex-officio member and chairman of the Council. Currently, there is one (1) minority (Black) member on the Consumer Advisory Council. His name is Sam Dillard and he resides in Louisville. The members are paid \$25 per for attending meetings 4 times a year. Members are also reimbursed for reasonable and necessary expenses. The payments are made from the Department of Law budget which the Consumer Protection Division is a part. The TRIAD group which I referenced yesterday is not governed by Consumer Protection Division. Thus, there was no need to ascertain further information regarding Title VI compliance.

5. **Prosecutors Advisory Council.** The Prosecutors Advisory Council is staffed by the OAG. Members are appointed by the Governor. They include three Commonwealth Attorneys', three County Attorneys' and two citizens, along with the Attorney General serving as Chairperson.

6. **Tobacco Compliance Advisory Board.** The Attorney General enacted the Tobacco Compliance Board set forth in accordance with an Administrative Order. This Board receives complaints which may violate the National Master Settlement Agreement. The Attorney General named representatives from the Department of Public Health, Department of Alcohol Beverage Control, the Department of Agriculture, the Kentucky Retail Federation and the Kentucky Attorney General.

UPDATE : January 1, 1995 to June 30, 1995.

As of June 30, 1995, the Office of the Attorney General is expected to have approximately two hundred and forty four (244) permanent full-time employees. Of these, sixteen (16) are minority employees, with six (6) in management positions. The Office of the Attorney General will continue to work to expand minority representation on its staff and when forming advisory bodies for this agency will aggressively seek to expand minority representation.

UPDATE: July 1, 1995 to June 30, 1996

As of June 1, 1996, the Office of the Attorney General has approximately two hundred and thirty one (231) permanent full-time employees. Of these 19 are minority employees, with 5 in management positions.

UPDATE: July 1, 1996 to June 30, 1997

As of January 1, 1995, the Office of the Attorney General is expected to have approximately two hundred and twenty-two (222) permanent full-time employees. Of these, fifteen (15) are minority employees, with five (5) in management positions.

UPDATE: July 1, 1997 to June 30, 1998

As of June 30, 1998, the Office of the Attorney General has approximately two hundred and forty eight (248) employees. Of these 23 are minority employees, with 6 in management positions.

UPDATE: July 1, 1998 to June 30, 1999

As of June 24, 1999, the Office of the Attorney General has approximately two hundred and sixty-one (261) employees. Of these 25 are minority employees. with 6 in management positions. This section shall be updated annually.

XIV. Definition of Common Terms

(a)“Subrecipient” means any recipient of federal funds from the Office of the Attorney General for the performance of a service authorized or required by the terms of the grant or contract making federal funds available for the purpose of carrying out a program or providing benefits or services to the general public. Incidental expenditures of federal funds through contracts with vendors (for example, for purchases of office supplies) shall not make those vendors subrecipients, unless the service or goods provided by the vendor is integral to the purpose for which the funds were provided, and not incidental to that purpose.

(b)“Recipient” means the Office of the Attorney General when federal financial assistance is extended, directly or through another recipient, for any program, but such term does not include the ultimate beneficiary under any such program. See generally Department of Justice Title VI definitions, 28 CFR 42.102.

(c)“Direct Beneficiaries” means members of the public receiving direct benefits or services, as is common with many programs in other agencies (such as housing assistance, job training, etc.), as opposed to the indirect benefits received by taxpayers generally (as when fraud or waste is uncovered and corrected).

UPDATE January 1, 1995 to June 30, 1995

Item #1 Update to Manual (Actually placed in manual).

Item #2 Complaints

The Office of the Attorney General has not received any complaints regarding Title VI compliance for the time period of January 1, 1995 to June 30, 1995.

Item #3 **Title VI Activities/Workgroup Activities:**

- 1)Obtained partial listing of Title VI contacts from other agencies.
- 2)Title VI Public Notification Statement added when feasible to office publications.
- 3)Created new Public Notification Statement to include ADA and Title VI. Distributed memo to staff.
- 4)Distributed new Title VI Manual to Division Directors and requested them to appoint a member of their staff to the Title VI Workgroup.
- 5)Requested updated information from Finance Branch relating to new federal grants.
- 6)Attended training on Title VI.
- 7)Title VI Plan/Manual written by John Gillig and Sam Floyd, Assistant Attorney's General
- 8)New poster including Title VI requirements distributed to all buildings.
- 9)Formed Workgroup. Held first meeting on September 20, 1995. Reviewed Title VI. Meeting notes available
- 10)Created questionnaire to be used for Division Director Reports.
- 11)Created list of responsibilities for Workgroup members relating to Title VI.
- 12)Notes from Workgroup meeting prepared.
- 13)Various divisions wrote and distributed a memo to staff dealing with Title VI compliance.
- 14)Divisions were checked for Title VI compliance. This was done by each Workgroup member while preparing the Division Directors Report.
- 15)Received Division Directors Reports. Analyzed reports in relation to Title VI compliance.
- 16)Preparation for final Workgroup meeting for 1-1-95 to 6-30-95 Title VI compliance.
- 17)Title VI Update Report written/sent to the Attorney General and the State Auditors Office.

Workgroup Activities:

- 1)The Office of the Attorney General Title VI Workgroup met on September 20, 1995. 9 Members were present.
- 2)Title VI was explained to the members and a discussion of the Title VI Plan was conducted. Included in this discussion were such topics as The Mission Statement, specifically prohibited discriminatory practices and the New Public Notification Statement.
- 3)Discussion was held concerning federal funds and the need to examine the Title VI Manual for any corrections or updates in relation to these funds.
- 4)All members were informed, all divisions must be in compliance whether they receive federal funds or not.
- 5)Preparation of Division Directors Reports was discussed. All Division Directors need to check final report and sign.

- 6)The following handouts were distributed at the meeting:
 - a)Extra Manuals
 - b)Responsibilities of Title VI Workgroup Representatives
 - c)ADA/Title VI Statement for Activities
 - d)Questions for Division Directors Reports
 - e)Extra questionnaire from the State Auditor's Office
- 7)Handouts were discussed.
- 8)Statement of Assurances/Title VI Plans from Subrecipients was discussed.
- 9)Date was set for submission of Title VI Division Directors Reports (September 29, 1995)
- 10) Discussion regarding next meeting was held.
- 11)Questions/Answer period was conducted.
- 12)After meeting an additional two handouts were distributed. They were as follows:
 - a)ADA/Title VI Public Notification Statement for Publications
 - b)Memo concerning Title VI which had previously been sent to staff.

Item #4 Summary of Division Director Reports

Division Director Reports received reflect a consensus as to compliance with Title VI regulations. The general consensus is as follows:

All beneficiaries regardless of race or national origin have been adequately informed of the availability of recipient services on an equal basis. Different admission standards have not been applied to applicants either openly or under cover of reasonable educational financial or other qualifications. No referrals because there were no reported instances of discrimination. Services supplied have been furnished consistently to all beneficiaries. All divisions and subrecipients have acknowledged implementation of all procedures and activities called for under the agency's published statement of compliance. All employment practices have been without discrimination. No complaints have been filed alleging Title VI violations with regard to the division's operating practices and procedures. Any new contracts with subrecipients have been identified in the Title VI Manual Update and all Title VI plans or statements of assurances are available for review from the OAG Title VI Coordinator. Services from all facilities are provided to clients without regard to race, color, or national origin. An employee has been appointed to serve as the Title VI Coordinator for the Office of the Attorney General. Minorities are represented on advisory boards. A written procedure exists for hearing and reviewing Title VI complaints. Records are maintained regarding all alleged cases of discrimination. Title VI posters have been distributed. New employees are clearly informed about their responsibilities under Title VI. All physical facilities and physical areas are made available to every client without regard to race, color, or national origin. The Personal Service Contracts form is used to obtain expert witnesses for the Office of the Attorney General. These forms include a statement of assurances that the expert will abide by all Federal Regulations pertaining to discrimination against race, color or national origin. All forms are signed by the parties involved. The Division Director Reports are available for review from the Office of the Attorney General Title VI Coordinator.

Item #5 Status of Sub-Recipients Compliance Plans

All subrecipients compliance plans/statement of assurances which are necessary are attached to each Division Directors Report. All statements of compliance appear to be in order.

Item #6 Summary of Title VI Compliance and Enforcement Data

The Office of the Attorney General is in compliance with the requirements of Title VI. The Office of the Attorney General has not received any complaints regarding violations of Title VI. The OAG is committed to the spirit and intent of Title VI regulations and will continue to enforce and monitor Title VI compliance as it relates to all programs and services of the agency.

UPDATE: July 1, 1995 to June 30, 1996

ITEM #1: UPDATE TO MANUAL (Actually placed in manual.)

ITEM #2: COMPLAINTS

The Office of the Attorney General has not received any complaints regarding Title VI Compliance for the time period of July 1, 1995 to June 30, 1996.

ITEM #3: Title VI Activities/Workgroup Activities

Title VI Activities

Federal and State Regulation posters were checked for compliance. Shared information with other state agency regarding OAG Title VI Compliance Plan. Updated the Minority Report. Received a copy of the application for federal funding from the Criminal Appellate Division. Meeting was held with the new administration representative and the Title VI Coordinator to discuss Title VI compliance. Workgroup meeting was set up and held.

Workgroup Activities

The Office of the Attorney General Title VI Workgroup met on June 19, 1996. Eight members were present. Minutes of the last meeting were read and approved, with the exception of one correction. A member who was present at the previous meeting was not included in the listing of members present. This item was corrected. The following handouts were distributed:

- 1) Responsibilities of Workgroup Members
- 2) Title VI Update for January 1, 1995 to June 30, 1995.
- 3) Minority Staff Report
- 4) Title VI Activities
- 5) Public Notification Statement for Publications (After meeting sent Public Notification Statement for Activities to each Workgroup member.)
- 6) Copy of sample memo used by the Special Prosecutions Division to notify each employee in their division of their Title VI responsibilities.

Each representative went over each of their respective division reports. The Title VI Coordinator read and went over the division reports for the representatives which were absent. All Division Directors Reports received at this time seem to be in order. Discussion as to the existence of any new federal grants was made. No new grants seem to exist other than those listed in the Division Directors Reports. The Procedure to assure sub-recipient compliance was discussed and agreed all was in compliance. There have been no Complaints filed against this agency at this time. The activities were discussed in Item #3. Training was discussed in IX of the manual and more training will be available for management staff this fiscal year. Probably on the following topics: sensitivity, ADA, sexual harassment, EEO, behavioral interviewing and other. A memo to be sent to all staff was discussed in order for them to be aware of their responsibility as to Title VI. The Publication Notification was discussed and the fact that it must be placed on each public document from this office. After a few brief comments from Mr. Cubine, the meeting adjourned.

ITEM #4:SUMMARY OF DIVISION DIRECTOR REPORTS

Division Director Reports received reflect a consensus as to compliance with Title VI regulations. The general consensus is as follows:

All beneficiaries, regardless of race or national origin have been adequately informed of the availability of recipient services on an equal basis. Different admission standards have not been applied to applicants either openly or under cover of reasonable educational, financial or other qualifications. No referrals have been made to subrecipients who discriminate because there were no reported instances of discrimination. Services supplied have been furnished consistently to all beneficiaries. All divisions and subrecipients have acknowledged implementation of all procedures and activities called for under the agency's published statement of compliance. All employment practices have been without discrimination procedures. Any new contracts with subrecipients have been identified in the Title VI Manual Update and all Title VI plans of statements of assurances are available for review from the OAG Title VI Coordinator. Services from all facilities are provided to clients without regard to race, color, or national origin. An employee has been appointed to serve as Title VI. Coordinator for the Office of the Attorney General. Minorities are represented on advisory boards. A written procedure exists for hearing and reviewing Title VI Complaints. Records are maintained regarding all alleged of discrimination. Title VI posters have been distributed. New employees are clearly informed about their responsibility under Title VI. All physical facilities and physical areas are made available to ever client without regard to race, color, or national origin. The Personal Service Contracts form is used to obtain expert witnesses for the Office of the Attorney General. These forms include a statement of assurances that the expert will abide by all Federal Regulations pertaining to discrimination against race, color or national origin. All forms are signed by the parties involved. The Division Director Reports are available for review from the Office of the Attorney General Title VI Coordinator.

ITEM #5:STATUS OF SUB-RECIPIENTS COMPLIANCE PLANS

All sub-recipients compliance plans/statement of assurances which are necessary are attached to each Division Director Report. All statements of compliance appear to be in order.

ITEM #6: SUMMARY OF TITLE VI COMPLIANCE/ ENFORCEMENT DATA

The Office of the Attorney General is in compliance with the requirements of Title VI. The Office of the Attorney General has not received any complaints regarding violations of Title VI. The OAG is committed to the spirit and intent of Title VI regulations and will continue to enforce and monitor Title VI compliance as it relates to all program and services of the agency.

UPDATE: July 1, 1996 to June 30, 1997

ITEM #1: UPDATE TO MANUAL (ACTUALLY PLACED IN MANUAL)

ITEM #2: COMPLAINTS

The Office of the Attorney General has not received any complaints regarding Title VI compliance for the time period of July 1, 1996 to June 30, 1997.

ITEM #3: TITLE VI ACTIVITIES/WORKGROUP ACTIVITIES

Federal and State Regulation posters were checked for compliance. Updated Minority Report. Held Workgroup Meeting. New member appointed for new division Roberta Merideth for Office of Rate Intervention Division. Title VI Manuals including Updates to 6-30-96 were distributed to Division Directors and Title VI Workgroup members. A number of management staff attended various training seminars relating to discrimination. A memo was distributed to staff concerning Title VI regulations. This was done by individual division directors.

Workgroup Activities

The Office of the Attorney General Title VI Workgroup met on June 7, 1997. 10 Representatives were present. The reading of the minutes of the last meeting were dispensed with. A list of activities of the Title VI Program was distributed with no discussion. There were no formal complaints filed during this time period concerning Title VI. Federal grants were reviewed and discussed. Procedures have been reviewed to assure subrecipient compliance and no complaints were made or any actions needed concerning federal grants. The Workgroup was asked to address any significant problems of general compliance and make recommendations. None were addressed. It was discussed that the disclaimer still needs to be placed on all office publications and notices of activities. A list of training completed for FY 96-97 was distributed. Training was discussed and it was decided that for Fiscal Year 97-98 a list of training will be developed to be completed by all management staff. The list will be compiled and implemented by the Principal Assistant and Title VI Coordinator. Suggestions were made concerning possible classes. These included: Equal Employment Opportunity, Behavioral Interviewing, Americans With Disabilities Act, Sensitivity Training, Others.... Awareness/Training concerning subrecipients was also discussed. It was concluded, that subrecipients would be sent, if practical, a copy of our Title VI Manual. Division Directors Reports were discussed. There were no problems found. It was discussed that a memo be sent to all staff from each Division Director informing them about Title VI. Minority Representation on Advisory Boards was discussed. We concluded that for the most part all boards within our discretion had minority representation. The Child Sexual Abuse and Exploitation Prevention Board is not represented by a minority. These appointments are made by the Governor. A handout was distributed concerning the responsibilities of the workgroup members. After a roundtable discussion concerning Title VI miscellaneous items, the meeting adjourned.

ITEM #4: SUMMARY OF DIVISION DIRECTORS REPORTS

Division Director Reports received reflect agreement as to compliance with Title VI regulations. The general consensus is as follows: All beneficiaries, regardless of race or national origin have been adequately informed of the availability of recipient services on an equal basis. Different admission standards have not been applied to applicants either openly or under cover of reasonable educational, financial or other qualifications. No referrals have been made to subrecipients who discriminate because there were no reported instances of discrimination. Services supplied have been furnished consistently to all beneficiaries. All divisions and subrecipients have acknowledged implementation of all procedures and activities called for under the agency's published statement of compliance. All employment practices have been without discrimination procedures. No complaints have been filed alleging Title VI violations with regard to the division's operating practices and procedures. Any new contracts with subrecipient have been identified in the Title VI Manual Update and all Title VI plans of statements of

assurances are available for review from the OAG Title VI Coordinator. Services from all facilities are provided to clients without regard to race, color, or national origin. An employee has been appointed to serve as the Title VI Coordinator for the Office of the Attorney General. Minorities are represented on all advisory boards except one. The Child Sexual Abuse and Exploitation Prevention Board does not have a minority representative. These appointments are made by the Governor. A written procedure exists for hearing and reviewing Title VI Complaints. Records are maintained regarding all alleged cases of discrimination. Title VI Posters have been distributed. New employees are clearly informed about their responsibility under Title VI. All physical facilities and physical areas are made available to every client without regard to race, color, or national origin. The Personal Service Contracts form is used to obtain expert witnesses for the Office of the Attorney General. These forms include a statement of assurances that the expert will abide by all Federal Regulations pertaining to discrimination against race, color or national origin. All forms are signed by the parties involved. The Division Director Reports are available for review from the Office of the Attorney General Title VI Coordinator.

ITEM #5: STATUS OF SUB-RECIPIENT COMPLIANCE PLANS

All sub-recipients compliance plans/statement of assurances which are necessary are attached to each Division Directors Report. All statements of compliance appear to be in order.

ITEM#6: SUMMARY OF TITLE VI COMPLIANCE AND ENFORCEMENT DATA

The Office of the Attorney General is in compliance with the requirements of Title VI. The Office of the Attorney General has not received any complaints regarding violations of Title VI. The OAG is committed to the spirit and intent of Title VI regulations and will continue to enforce and monitor Title VI compliance as it relates to all program and services of the agency,

UPDATE: July 1, 1997 to June 30, 1998

ITEM #1 Update to Manual actually placed in Manual.

ITEM #2 Complaints-Two Complaints were filed during this time period. One was resolved and the other is pending in Franklin Circuit Court.

ITEM #3 TITLE VI ACTIVITIES/WORKGROUP ACTIVITIES

Federal and State regulation posters were updated and checked for compliance. Updated Minority Report. Held workgroup meeting on June 25, 1998. Title VI Manuals including updates to 6-20-97 were distributed to Title VI Workgroup members to be shared with Division Directors. A number of management staff attended the following training sessions: Sensitivity Training, Disability Awareness Training, Ethics in the Workplace, Transitional Analysis Training, Communications, and EEO and You Training. Each division distributed a memo to staff concerning Title VI regulations.

Workgroup Activities

The Office of the Attorney General Title VI Workgroup met on June 25, 1998. 11 Representatives were present. The reading of the minutes of the last meeting were dispensed with. A list of Title VI Activities for the past year was read and distributed. There were two formal complaints/grievances filed during the reporting time period. These were discussed briefly as to status. The workgroup was informed that each division should report to the Title VI or EEO Coordinator immediately any complaints registered with their respective divisions. A narrative of each of the complaints is discussed below. Federal grants were reviewed and discussed. Procedures have been reviewed to assure subrecipient compliance and no complaints were made or any actions needed concerning federal grants. The Workgroup was asked to address any significant problems of general compliance and make recommendations. None were addressed. It was stressed that the OAG/Title VI disclaimer statement needs to be placed on all publications, etc.... A copy of the disclaimer for publications and for activities was distributed. A list of training was distributed. Training was discussed relating to the EEO Committee offering more training for the next year. Subrecipients will be sent a copy of the State EEO Manual. Division Directors Reports were discussed. Minority Representation on Advisory Boards was discussed. We concluded that for the most part all boards within our discretion had minority representation. The Governor makes most of the appointments to the boards discussed. A handout was distributed concerning the responsibilities of the workgroup members as well as a pamphlet from the U.S. Department Justice relating to Your Rights Under Title VI. After a roundtable discussion concerning Title VI miscellaneous items, the meeting adjourned.

ITEM #4 SUMMARY OF DIVISION DIRECTORS REPORTS

Division Director Reports received reflect agreement as to compliance with Title VI regulations.

The general consensus is as follows:

All beneficiaries, regardless of race or national origin have been adequately informed of the availability of recipient services on an equal basis. Different admission standards have not been applied to applicants either openly or under cover of reasonable educational, financial, or other qualifications. No referrals have been made to subrecipients who discriminate because there were no reported instances of discrimination. Services supplied have been furnished consistently to all beneficiaries. All divisions and subrecipients have acknowledged implementation of all procedures and activities called for under the agency's published statement of compliance. All employment practices have been without discrimination. Two complaints have been filed. One has been resolved and the other is pending in Franklin Circuit Court. Any new contracts with subrecipients have been identified in the Title VI Manual Update and all Title VI plans of statements of assurances are available for review from the OAG Title VI Coordinator for the Office of the Attorney General or in the agency's individual division offices'. Services from all facilities are provided to clients without regard to race, color, or national origin. An employee has been appointed to serve as the Title VI Coordinator for the Office of the Attorney General. Minorities are represented on all advisory boards with which we have control. Most appointments are made by the Governor. A written procedure exists for hearing and reviewing Title VI complaints. Records are maintained regarding all alleged cases of discrimination. Title VI posters have been distributed. New employees are clearly informed about their responsibilities under Title VI. All physical facilities and physical areas are made available to every client without regard to race, color, or national origin. The Personal Service contracts form is used to obtain expert witnesses for the Office of the Attorney General. These forms include a statement of assurances that the expert will abide by all Federal Regulations pertaining to discrimination against race, color, or national origin. All forms are signed by the parties involved. The Division Director Reports are available for review from the Office of the Attorney General Title VI Coordinator.

ITEM #5 STATUS OF SUB-RECIPIENT COMPLIANCE PLANS

All sub-recipients compliance plans/statement of assurances which are necessary are attached to each Division Directors Report or are available from the Division Title VI contact. All statements of compliance are reported to be in order.

ITEM #6 SUMMARY OF TITLE VI COMPLIANCE AND ENFORCEMENT DATA

The Office of the Attorney General is in compliance with the requirements of Title VI. The OAG is committed to the spirit and intent of Title VI regulations and will continue to enforce and monitor Title VI compliance as it relates to all programs and services of the agency.

UPDATE: July 1, 1998 to June 30, 1999

ITEM #1 Update to Manual actually placed in Manual.

ITEM #2 Complaints-There were no complaints filed for this time period in relation to Title VI.

ITEM #3 TITLE VI ACTIVITIES/WORKGROUP ACTIVITIES

Federal and State regulation posters checked for compliance. Updated the Minority Report. Held Workgroup meeting. Title VI Manuals including updates 6-30-98 were distributed to Title VI Workgroup members to be shared with Division Directors. A number of management staff attended the following training sessions: Team Building, Ethics in the Workplace, What Collar Do You Wear, Employee Evaluation Training, Keap, Sexual Harassment Prevention, Stress Management, Body Language, Active Listening, Sensitivity Training, Dealing With Conflict, Building A Bridge, Workforce Diversity, Intro. To Critical Incident Stress. Distributed the 1998 State Auditors Title VI Compliance Executive Summary to Workgroup members to share with Division Directors.

Workgroup Activities

The Office of the Attorney General Title VI Workgroup met on July 08, 1999. 11 Representatives were present. The reading of the minutes of the last meeting were dispensed with. A list of Title VI Activities for the past year was distributed. There were no new complaints during this period.. . Federal grants were reviewed and discussed. Procedures have been reviewed to assure subrecipient compliance and no complaints were made or any actions needed concerning federal grants. The Workgroup was asked to address any significant problems of general compliance and make recommendations . None were addressed. It was stressed that the OAG/Title VI disclaimer statement needs to be placed on all publications, etc.... A copy of the disclaimer for publications and for activities was distributed.

A list of training was included on the Activities sheet which was distributed. Training was discussed relating to the EEO Committee offering more training for the next year. Division Directors Reports were discussed. Minority Representation on Advisory Boards was discussed. We concluded that for the most part all boards within our discretion had minority representation. The Governor makes most of the appointments to the boards discussed. A handout was distributed concerning the responsibilities of the workgroup members as well as a pamphlet from the U.S. Department Justice relating to Your Rights Under Title VI. After a roundtable discussion concerning Title VI miscellaneous items, the meeting adjourned.

ITEM #4 SUMMARY OF DIVISION DIRECTORS REPORTS

Division Director Reports received reflect agreement as to compliance with Title VI regulations. The general consensus is as follows:

All beneficiaries, regardless of race or national origin have been adequately informed of the availability of recipient services on an equal basis. Different admission standards have not been applied to applicants either openly or under cover of reasonable educational, financial, or other qualifications. No referrals have been made to subrecipients who discriminate because there were no reported instances of discrimination. Services supplied have been furnished consistently to all beneficiaries. All divisions and subrecipients have acknowledged implementation of all procedures and activities called for under the agency's published statement of compliance. All employment practices have been without discrimination. One complaint is still pending in Franklin Circuit Court. No other complaints were received during this period. Any new contracts with subrecipients have been identified in the Title VI Manual Update and all Title VI plans of statements of assurances are available for review from the OAG Title VI Coordinator for the Office of the Attorney General or in the agency's individual division offices'. Services from all facilities are provided to clients without regard to race, color, or national origin. An employee has been appointed to serve as the Title VI Coordinator for the Office of the Attorney General. Minorities are represented on all advisory boards with which we have control. Most appointments are made by the Governor. A written procedure exists for hearing and reviewing Title VI complaints. Records are maintained regarding all alleged cases of discrimination. Title VI posters have been distributed. New employees are clearly informed about their responsibilities under Title VI. All physical facilities and physical areas are made available to every client without regard to race, color, or national origin. The Personal Service contracts form is used to obtain expert witnesses for the Office of the Attorney General. These forms include a statement of assurances that the expert will abide by all Federal Regulations pertaining to discrimination against race, color, or national origin. All forms are signed by the parties involved. The Division Director Reports are available for review from the Office of the Attorney General Title VI Coordinator.

ITEM #5 STATUS OF SUB-RECIPIENT COMPLIANCE PLANS

All sub-recipients compliance plans/statement of assurances which are necessary are attached to each Division Directors Report or are available from the Division Title VI contact. All statements of compliance are reported to be in order.

ITEM #6 SUMMARY OF TITLE VI COMPLIANCE AND ENFORCEMENT DATA

The Office of the Attorney General is in compliance with the requirements of Title VI. The OAG is committed to the spirit and intent of Title VI regulations and will continue to enforce and monitor Title VI compliance as it relates to all programs and services of the agency.

Malea Meredith Vincent
Title VI Coordinator
Office of the Attorney General

GENERAL GOVERNMENT CABINET

OFFICE OF THE GOVERNOR



COMMONWEALTH OF KENTUCKY
OFFICE OF THE GOVERNOR

PAUL E. PATTON
GOVERNOR

700 CAPITOL AVENUE
SUITE 100
FRANKFORT, KY 40601
(502) 564-2611
FAX: (502) 564-2517

July 1, 1999

Mr. Edward B. Hatchett, Jr.
Auditor of Public Accounts
194 Capitol Avenue
Frankfort, Kentucky 40601

Dear Mr. Hatchett:

The Office of the Governor has no changes to its current Title VI Implementation Plan. To date, no complaints have been received requiring response or action by this office. A copy of the Implementation Plan is enclosed for your convenience and immediate review.

Should you have any questions or need additional information, please feel free to immediately inquire.

Sincerely,

Michael T. Alexander
Deputy General Counsel

Copy: Beverly Watts, Executive Director
Kentucky Commission on Human Rights



AN EQUAL OPPORTUNITY EMPLOYER M/F/D

TITLE VI

IMPLEMENTATION PLAN

Office of the Governor

July 1, 1999

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i. OVERVIEW

This implementation plan describes how the Office of the Governor will comply with Title VI of the Civil Rights Act of 1964 and respond to complaints of discrimination based on race, color, or national origin. The Office of the Governor serves as the chief representative office of the Commonwealth in matters relating to state government and the Executive Branch agencies.

I. PURPOSE AND MISSION STATEMENT

The purpose of Title VI of the Civil Rights Act of 1964 is to prohibit programs which receive federal funds from discriminating against beneficiaries on the basis of race, color, or national origin. The intent of the law is to ensure that no person shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance.

II. SCOPE (Legal Authority)

The Office of Governor affords all individuals the opportunity to benefit from programs administered by it or an Executive Branch agency which receives federal funds.

A. Title VI of the Civil Rights Act of 1964 (U. S. C. § 2000d) provides:

No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

B. 34 C. F. R. § 100.1, 100.2, and 100.3 implement the provisions of the federal statute.

C. KRS 344.015 § 1(2) states:

Each state agency shall:

- (a) Develop a Title VI implementation plan by January 1, 1995. If required by Title VI or regulations promulgated thereunder, the implementation plan shall:
 - 1. Be developed with the participation of protected beneficiaries; and
 - 2. Include Title VI implementation plans of any sub-recipients of federal funds through the state agency;

- (b) Submit a copy of the implementation plan to the Auditor of Public Accounts and the Human Rights Commission; and
- (c) Submit annual Title VI compliance reports and any implementation plan updates to the Auditor of Public Accounts and the Human Rights Commission by July 1, 1995, and each July 1 thereafter.

The federal statute codified as 42 U. S. C. § 2000d and the state statute KRS 344.015 § 1(2) provide the authority for the development of this plan and describe the extent of the authority.

Title VI applies to discriminatory acts based on race, color, or national origin and specifically prohibits the exclusion of individuals or groups from participation in, or enjoying the benefits of, federal programs. Title VI does not provide relief for discrimination based on age, sex, disability, geographic location, or wealth.

III. RESPONSIBLE OFFICIAL

The General Counsel, Office of the Governor, has overall responsibility for compliance with the provisions of Title VI. Inquiries related to compliance activities should be directed to:

Denis B. Fleming, Jr.
General Counsel
Office of the Governor
Room 103 The Capitol
Frankfort, Kentucky 40601

IV. COMPLAINT PROCEDURES

A. Filing of Complaints

Complaints in relation to alleged discrimination under Title VI of the Civil Rights Act of 1964 may be filed with the Office of the Governor Title VI compliance officer using the forms attached in the Appendix. Upon receipt of a written complaint, the compliance officer shall review the complaint and shall file, within seven (7) days, a concise statement with the General Counsel of the nature of the complaint and the steps to be taken to investigate or resolve the complaint.

If an individual refuses to submit a written complaint, the compliance officer shall record the information orally from the individual and shall provide a copy to the individual with a request that the information be confirmed by the complainant.

B. Who May File

A complaint may be filed by anyone who believes that the Office of the Governor has discriminated against a participant, beneficiary, or a class of beneficiaries on the basis of race, color, or national origin.

The Office of the Governor will act on a complaint by any individual, provided that no final action will be taken by Office of the Governor unless the ultimate beneficiary or participant acknowledges the substance of the complaint in writing. If the Title VI compliance officer determines independently that a violation of Title VI has occurred, then final action may be taken by Office of the Governor without verification by the ultimate beneficiary or participant.

C. Time Period for Filing

Complaints must be filed within one hundred eighty (180) days of the activity which prompts the filing of the complaint.

D. Required Action by the Office of the Governor

Upon receipt of the complaint by an individual or at the time the compliance officer becomes independently aware of actions which may constitute a violation of Title VI, the compliance officer shall take necessary action within thirty (30) days to investigate and recommend specific actions to resolve the complaint. A report shall be filed by the compliance officer with the General Counsel within that period.

The complainant shall be notified in writing of the results of the investigation and any actions taken.

The Office of the Governor shall attempt to maintain the confidentiality of the complaint and the name of the complainant.

The General Counsel shall implement corrective actions within thirty (30) days of receipt and acceptance of a final report by the compliance officer.

V. COMPLIANCE

A. Notification of Title VI Requirements

During the fiscal year ended June 30, 1998, the Office of the Governor received no federal funds. The Office of the Governor does not anticipate receiving federal funds during the current fiscal year.

B. Resolution of Complaints

The Office of the Governor, upon notification of a complaint by any party, including a grant sub-recipient, or upon becoming aware of any violation through compliance efforts, shall attempt to secure voluntary compliance with Title VI. In the event that efforts to secure voluntary compliance are not secured within a reasonable period of time, the compliance officer will notify the General Counsel, in writing, of the recommended corrective action.

C. Implementation of Corrective Actions

The General Counsel will act within thirty (30) days after receipt of a recommendation by the compliance officer to implement a corrective action.

The complainant shall be notified in writing by the General Counsel or the Title VI compliance officer of the resolution of a complaint. A statement of corrective action shall include specific statements of actions to be taken or prohibited actions and shall include a timetable for implementation.

Employees or grant sub-recipients who refuse to voluntarily comply with Title VI or to take corrective actions required by the Office of the Governor shall face disciplinary action, or in the case of grant sub-recipients, may face termination or suspension of the grant.

VI. TRAINING

The Title VI implementation plan will be disseminated to all Governor's Office employees along with complaint procedures. Sub-recipients of grants will be notified of the Title VI implementation plan and complaint procedures at the time of any grant award.

VII. GOALS AND EVALUATION PROCEDURES

A. Goals

1. Report compliance activities in a timely manner.
2. Respond to and investigate all complaints within the timeframe and in accordance with the procedures outlined in Section IV.
3. Obtain information from employees to determine if the plan is adequate to address their needs and the requirements of Title VI.

VIII. PUBLIC NOTIFICATION

Two groups of people will receive notification: 1) office employees who will receive copies of the implementation plan and the complaint procedures; and, 2) sub-recipients of grants who will be notified of Title VI requirements at the time of any grant award.

IX. RECORDKEEPING AND REPORTING

A. Complaints

1. The compliance officer will maintain a log of all complaints filed with the Office of the Governor.
2. Grant personnel will certify annually that all sub-recipients have been notified of the Title VI implementation plan and complaint procedures.
3. The compliance officer will maintain copies of complaint forms and will ensure that they are available for use.

B. Reporting

1. Changes in the Title VI implementation plan will be provided to employees and sub-recipients as changes are made.
2. Changes in the Title VI implementation plan will be forwarded to the State Auditor as changes are made.
3. Grant personnel will maintain records of all sub-recipients in order that the Office of the Governor can determine if eligible parties are participating in the grants.

X. MINORITY REPRESENTATION

The staff of the Office of the Governor is currently ninety-three (93), including seven (7) minorities as defined by Title VI. The Office continues to attempt to identify and employ qualified minority applicants.

XI. GLOSSARY OF COMMON TERMS

“Beneficiary or recipient” means the individual or organization for whom federal funds are intended.

“Implementation plan” means the Title VI implementation plan developed and maintained by the Office of the Governor to ensure compliance with 42 U. S. C. § 2000d et. seq. and KRS 344.015.

“Title VI Compliance Officer” means the Office of the Governor employee designated by the General Counsel to coordinate all Title VI activities of the Office.

XII. APPENDICES

**OFFICE OF THE GOVERNOR
ROOM 100, THE CAPITOL
FRANKFORT, KENTUCKY 40601
Telephone: (502) 564-2511
Fax: (502) 564-2517**

**Complaint Under Title VI
The Civil Rights Act of 1964**

To Title VI Coordinator:

I, _____, hereby file an official complaint against

_____ located at

Name of Persons or Agency

Date of alleged discrimination: _____.

Complainant's address: _____

Complainant's telephone number: _____.

Basis of complaint (use back of sheet if necessary):

Signed: _____

Date: _____

**OFFICE OF THE GOVERNOR
ROOM 100, THE CAPITOL
FRANKFORT, KENTUCKY 40601
Telephone: (502) 564-2611
Fax: (502) 564-2517**

Report of Investigation

I, _____, representing the Office of the Governor, have
Title VI Coordinator
investigated the complaint filed on _____ by _____
Date Name of Complainant
alleging that discrimination occurred which was in violation of the provisions of
Title VI of the Federal Civil Rights Act.

The results of the investigation were as follows:

- _____A. The agency or person was found to be in violation of Title VI.
- _____B. The agency or person was not found to be in violation of Title VI.
- _____C. The complainant withdrew the complaint.

A copy of the investigative report is attached.

Withdrawal of Complaint (if applicable) _____

If the agency or person was found to be in violation of Title VI, a brief description of the
remedial action taken to assure future compliance follows:

Signed: _____

Date: _____

GENERAL GOVERNMENT CABINET
KENTUCKY COMMISSION ON HUMAN RIGHTS



KENTUCKY COMMISSION ON HUMAN RIGHTS

July 1, 1999

THE HEYBURN BLDG., 7TH FLOOR
332 WEST BROADWAY
LOUISVILLE, KY 40202
(502) 595-4024
TOLL FREE 1-800-292-5566
FAX (502) 595-4801
TDD (502) 595-4084
WEBSITE: www.ave.net/~kchr/
E-MAIL: KCHR@USA.NET

Mr. Edward B. Hatchett, Jr.
Auditor of Public Accounts
Room 144, Capitol Annex
Frankfort, Kentucky 40601

CHAIR
PAMELA R. GOODWINE
LEXINGTON

ROBERT B. BOWLING
MIDDLESBORO

THURMOND COLEMAN, SR.
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LEXINGTON

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ALEXANDRIA

KAREN V. McCORD
ELIZABETHTOWN

JOSEPH McMILLAN
LOUISVILLE

SUSAN D. PHILLIPS
LOUISVILLE

MARY ANN STEWART
CRESTVIEW HILLS

Dear Auditor Hatchett:

Enclosed is the Kentucky Commission on Human Rights Title VI 1999 report and implementation plan update as required by KRS 344.015. We are providing the updated information. Our plan as it relates to Sections I through XV are the same with the following exceptions.

Should you have any questions about this update, please feel free to contact me or Al Adams at 1 (800) 292-5566.

Sincerely,

Beverly L. Watts
Executive Director

BLW:ldt

BEVERLY L. WATTS
EXECUTIVE DIRECTOR

\\intranet\users\LINDA\WPDOCS\CORREAPO\HATCHETT.Title VI Submission 7-1-99.wpd
An Equal Opportunity Employer M/F/D

KCHR TITLE VI PLAN UPDATES

i. 1999 TITLE VI COMPLIANCE REPORT UPDATE

No changes from 6/30/98 Plan

ii OVERVIEW

No changes from 6/30/98 Plan

I. PURPOSE AND MISSION STATEMENT

No changes from 6/30/98 Plan

II. SCOPE AND LEGAL AUTHORITY

No changes from 6/30/98 Plan

III. RESPONSIBLE OFFICIAL

...The responsible individual for coordinating compliance with Title VI is assigned to Alfred Adams, Administrative Specialist III.

Any and all inquiries relating to Title VI shall be sent to:

Alfred Adams

Administrative Specialist III

Kentucky Commission on Human Rights

The Heyburn Building

332 West Broadway, Suite 700

Louisville, Kentucky 40202

Telephone: (502) 595-4024, Extension 220

(502) 595-4801 (Fax)

1 (800) 292-5566 (Toll Free)

(502) 595-4084 (TDD) or

1 (800) 648-6056 (KY Relay Service)

IV. STATEMENT OF ASSURANCE

No changes from 6/30/98 Plan

V. EFFECTIVE DATE

No changes from 6/30/98 Plan

VI. PROGRAMS OR ACTIVITIES SUBJECT TO TITLE VI

The Kentucky Commission on Human Rights has opened with cash balances as of June 30, 1999 the following **three (3)** federal awards:

1. U.S. Department of Housing and Urban Development (HUD) Fair

KCHR TITLE VI PLAN UPDATE

July 1, 1999

Page Two

Housing Assistance Program (FHAP) Cooperative Agreement

FF204K984004

1413-99

FF204K974004

These contracts provides for the dual-filing of fair housing discrimination complaints with the Kentucky Commission on Human Rights and HUD. These complaints may be filed on the basis of race, color, national origin, religion, age, disability, familial status, or sex. There are no subrecipients.

2. The U.S. Department of Housing and Urban Development (HUD) Fair Housing Initiative and Voluntary Programs Administrative Enforcement Initiative (FHIP)

FH400G97060

1412-98

This award provides for funds to develop special programs to enhance equal access to housing throughout the Commonwealth of Kentucky. This grant included subrecipients who completed the Title VI assurance form. The subrecipient were:

Lexington Apartment Association
210 Malibu Drive

Lexington, Kentucky 40502

Louisville Apartment Assn.
7400 South
Park Place

Louisville, Kentucky 40222

Michael A. Spare
P.O. Box 355
Hazard, Kentucky 41702

Reports are given and judged based on grant timelines. Subrecipients have adopted the Kentucky Commission on Human Rights Title VI Plan and provided written assurances of their compliance with Title VI. The assurances are on file at the Commission on Human Rights.

KCHR TITLE VI PLAN UPDATE

July 1, 1999

Page Three

3. U.S. Equal Employment Opportunity Commission (EEOC) Fair Employment Practices agency (FEPA) Cooperative Worksharing Agreement Charge Resolution and Training

9/5010/1502

1391-97

This grant provides for the dual-filing of employment discrimination complaints with the Kentucky Commission on Human Rights and Equal Employment Opportunity Commission. For agencies who have state laws comparable to Title VII of the Civil Rights Act of 1964.

Complaints may be filed on the basis of race, color, national origin, age, sex, religion, or disability. There are no subrecipients.

VII. COMPLAINT PROCEDURES/SYSTEM

Effective 7/1/99, the Title VI Coordinator is Alfred Adams

VIII. COMPLIANCE/NONCOMPLIANCE

No changes from 6/30/98 Plan

IX. TRAINING (STAFF-LEVEL, SUBRECIPIENTS and BENEFICIARIES)

No changes from 6/30/98 Plan

X. GOALS and EVALUATION PROCEDURES

No changes from 6/30/98 Plan

XI. PUBLIC NOTIFICATION/OUTREACH

No changes from 6/30/98 Plan

XII. RECORDKEEPING/REPORTING

No changes from 6/30/98 Plan

XIII. REPRESENTATION BOARD/ADVISORY BODY/STAFF

Governing Body - Effective June 30, 1999, there are currently eleven (11) Commissioners, six (6/55%) African-American and five (5/45%) White

Advisory Committee - No changes from 6/30/98 Plan

KCHR TITLE VI PLAN UPDATE

July 1, 1999

Page Four

Staff - Full-time staff as of June 30, 1999 consisted of the following:

17 White

14 African-American

7 Vacant positions

XIV. GLOSSARY/DEFINITION OF COMMON TERMS

No changes from 6/30/98 Plan

XV. APPENDICES

No changes from 6/30/99 Plan

Kentucky Commission on Human Rights
Title VI Self-Survey

Part I:

1. Date of Survey: June 30, 1999

2. Type of Survey: Annual

3. Name of Facility/Agency: Kentucky Commission on Human Rights
Street Address: 332 West Broadway, The Heyburn Building
City, County, State: Louisville - Jefferson County- Kentucky

4. Name of Administrative Head: Beverly L. Watts
Title: Executive Director

5. Name of Title VI Coordinator: Alfred G. Adams

6. Do you have an advisory or planning group?

Yes X No

A. If yes, how many are on the board?

Governing Body - The Kentucky Commission on Human Rights is governed by eleven (11) Commissioners who pursuant to KRS 344.1 50 are appointed by the Governor. Of those currently serving as commissioners. 55% are African American and 45% are white.

Advisory Committee - The Commission is authorized by statute to establish advisory Committees. During the 96-97FY the Kentucky's Black Heritage Textbook Advisory Committee was formed for the purposes of reviewing and making recommendations on the proposed content of the textbook which is in the process of being revised. The Advisory Committee is composed of five (62%) white persons and three (38%) African American persons.

Staff - The Kentucky Commission on Human Rights is authorized a full-time staffing complement of thirty-five (35) persons. Full-time staff as of June 30, 1999 consisted of seventeen (17) White persons and fourteen (14) African Americans.

B. What is the service population in your area?

The Kentucky Commission on Human Rights has statewide jurisdiction in the Commonwealth of Kentucky.

C. What is the minority population in your area? African-Americans are

KCHR 1999 Title VI Self-Survey
Page Two

approximately 7.5% of the population in KY.

D. Have you considered achieving minority representation on the board?

The Kentucky Commission on Human Rights has achieved substantial minority representation on its board and advisory groups. (See 6 above)

7. Non-Discrimination Policies: Does your agency have a written policy stating that services will be provided to all persons without regard to race, color, or national origin?

Yes ☒ No ☐ Yes. The following written policy is included in all publications and is posted on the employees bulletin board ... "It is the policy of the Kentucky Commission on Human Rights to provide equal employment opportunities and access to services to all persons without regard to race, color, national origin, disability, sex, age, or religion."

8. Posters: Are posters containing Title VI information prominently displayed within the facility?
Yes ☒ No ☐

9. Do these posters show the name of the Local Coordinator to whom complaints should be referred? Yes ☒ No ☐

Records: Are permanent records kept of all Title VI complaints?

Yes ☒ No ☐

10. Complaints: Are permanent records kept of all Title VI complaints?
Yes ☒ No ☐

If applicable, describe below any complaints received in this reporting period. If additional space is needed, please attach that information to the back of this survey
No complaints were received.

Name of Complainant:

Race:

Charge:

Date of Charge:

Findings

Time Frame and Method of Monitoring to Ensure Compliance

KCHR 1999 Title VI Self-Survey
Page Three

11. Is Title VI information disseminated to your employees and, if applicable, program applicants?

Yes ☒ No

If yes, describe how they are informed. Through memo and training, as needed.

12. Are new employees informed about their specific responsibilities to clients under Title VI?

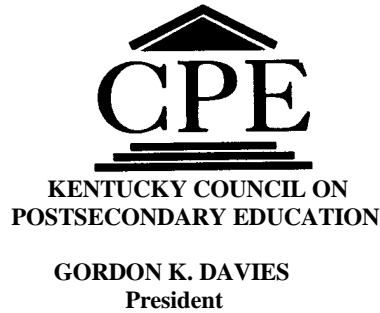
Yes ☒ No

13. Explain any particular problems, if any, you find with Title VI compliance. None

I declare that I have completed this survey to the best of my knowledge and believe it is true, correct and complete.

Beverly L. Watts
Executive Director

GENERAL GOVERNMENT CABINET
KENTUCKY COUNCIL ON POSTSECONDARY EDUCATION



MEMORANDUM

TO: Edward B. Hatchett, Jr.
Auditor of Public Accounts

FROM: Dennis L. Taulbee
Associate Vice President for Staff Services/
General Counsel

DATE: July 1, 1999

SUBJECT: Title VI Implementation Plan Update and Compliance Report

Enclosed is the Council on Postsecondary Education's annual Title VI Implementation Plan update and compliance report. This report is also being forwarded to the Human Rights Commission.

Please let us know if you need additional information.

ps

Enclosure

cc: Human Rights Commission

1024 CAPITAL CENTER DRIVE
SUITE 320
FRANKFORT, KY 40601-8204



502-573-1555 / FAX 502-573-1535
cpe@mail.state.ky.us / www.cpe.state.ky.us

An Equal Opportunity Employer

COUNCIL ON POSTSECONDARY EDUCATION
TITLE VI
IMPLEMENTATION PLAN EXECUTIVE SUMMARY
JULY 1, 1999

- I. PURPOSE AND/OR MISSION - No Change
- II. SCOPE/LEGAL AUTHORITY - No Change
- III. RESPONSIBLE OFFICIAL - No Change
- IV. STATEMENT OF ASSURANCES - No Change
- V. EFFECTIVE DATE - No Change
- VI. PROGRAMS/ACTIVITIES SUBJECT TO TITLE VI - No Change
- VII. COMPLAINT PROCEDURES/SYSTEM - No Change
- VIII. COMPLIANCE/NONCOMPLIANCE - No Change
- IX. TRAINING - No Change
- X. GOALS AND EVALUATION PROCEDURES - Goals Achieved
- XI. PUBLIC NOTIFICATION/OUTREACH - Achieved
- XII. RECORDKEEPING/REPORTING - Procedure Established
- XIII. MINORITY REPRESENTATION ON BOARD - Updated (15 Members - 1 of which is African-American)
- XIV. GLOSSARY/DEFINITION OF COMMON TERMS - No Change

Implementation Plan Update for Title IV of the Federal Civil Rights Act

July 1999

CPE

KENTUCKY COUNCIL
ON POSTSECONDARY EDUCATION

COUNCIL ON POSTSECONDARY EDUCATION
1024 Capital Center Drive, Suite 320
Frankfort, Kentucky 40601

Phone: (502) 573-1555
FAX: (502) 573-1535
Internet I.D.: CPE@MAIL.STATE.KY.US

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i. OVERVIEW

This implementation plan describes how the Kentucky Council on Postsecondary Education (CPE) will comply with Title VI of the Civil Rights Act of 1964 and respond to complaints of discrimination based on race, color, or national origin. CPE serves as the representative agency of the Commonwealth in matters of higher education and has a board of 16 members. It is attached to the General Government Cabinet for administrative purposes. CJPE has three divisions and administers two federal grant programs. (Eisenhower Mathematics and Science and the Kentucky Commission on Community Volunteerism and Service).

I. PURPOSE AND MISSION STATEMENT

The purpose of Title VI of the Civil Rights Act of 1964 is to prohibit programs that receive federal funds from discriminating against beneficiaries on the basis of race, color, or national origin. The intent of the law is to ensure that no person shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity receiving federal financial assistance. This plan was developed after obtaining guidance from a workshop conducted by the Auditor of Public Accounts and is based upon provisions of 34 C.F.R. Chapter 1, Part 100 Nondiscrimination under programs receiving federal assistance through the Department of Education effectuation of Title VI of the Civil Rights Act of 1964.

II. SCOPE (Legal Authority)

CPE affords all individuals the opportunity to benefit from programs administered by the agency and which receive federal funds.

A. Title VI of the Civil Rights Act of 1964 (U. S. C. § 2000d) provides:

No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.

B. 34 C.F.R. § 100.1, 100.2, and 100.3 implement the provisions of the federal statute.

C. KRS 344.015 § 1(2) states:

Each state agency shall:

- (a) Develop a Title VI implementation plan by January 1, 1995. If required by Title VI or regulations promulgated thereunder, the implementation plan shall:
 - 1 . Be developed with the participation of protected beneficiaries; and
 - 2. Include Title VI implementation plans of any sub-recipients of federal funds through the state agency;

- (b) Submit a copy of the implementation plan to the Auditor of Public Accounts and the Human Rights Commission; and
- (c) Submit annual Title VI compliance reports and any implementation plan updates to the Auditor of Public Accounts and Human Rights Commission by July 1, 1995, and each July 1 thereafter.

The federal statute codified as 42 U. S. C. § 2000d and the state statute KRS 344.015(2) provide the authority for the development of this plan and describe the extend of the authority.

Title VI applies to federal programs administered by the Council. These are as follows:

Eisenhower Program 20 U. S. C. § 1225(B)
The Kentucky Commission on Community Volunteerism and Service 42 U. S. C. § 12501

Title VI applies to discriminatory acts based on race, color or national origin and specifically prohibits the exclusion of individuals or groups from participation in, or enjoying the benefits of, federal programs. Title VI does not provide relief for discrimination based on age, sex, disability, geographic location, or wealth.

III. RESPONSIBLE OFFICIAL

The President of the Council on Postsecondary Education has overall responsibility for compliance with the provisions of Title VI. The day-to-day responsibility has been assigned to the Manager of Administrative Services. Inquiries related to compliance activities should be directed to:

Patricia C. Sawyer
Manager, Administrative Services
Kentucky Council on Postsecondary Education
1024 Capital Center Drive, Suite 320
Frankfort, Kentucky 40601
Phone: 502/573-1555

The amount of staff time and the budgetary resources committed by the Council to ensure compliance with Title VI are negligible due to the limited nature of federal programs.

IV. STATEMENT OF ASSURANCES

CPE complies with the provisions of Title VI of the Civil Rights Act of 1964 and the requirements of KRS 344.015 in regard to federal programs.

Sub-recipients of the Kentucky Commission on Community Volunteerism and Service are required to stipulate in writing, as a condition of acceptance of the federal grant, that they adopt the Title VI plan of CPE. Sub-recipients of the Eisenhower grants are institutions of higher education who are required to develop Title VI implementation plans and which have those plans in place.

V. EFFECTIVE DATE

The effective date of the implementation plan is January 1, 1995.

VI. PROGRAMS SUBJECT TO TITLE VI

Federal programs administered by CPE which fall under Title VI are as follows:

Eisenhower Program 20 U. S. C. § 1225(B)

The Kentucky Commission on Community Volunteerism and Service 42 U. S. C. § 12501

VII. COMPLAINT PROCEDURES

A. Filing of Complaints

Complaints in relation to alleged discrimination under Title VI of the Civil Rights Act of 1964 may be filed with the CPE Title VI compliance officer using the forms attached in the Appendix. Upon receipt of a written complaint, the compliance officer shall review the complaint and shall file, within seven (7) days, a concise statement to the President of the nature of the complaint and the steps to be taken by the agency to investigate or resolve the complaint.

If an individual refuses to submit a written complaint, the compliance officer shall record the information orally from the individual and shall provide a copy to the individual with a request that the complainant confirms the information.

B. Who May File

A complaint may be filed by anyone who believes that CPE has discriminated against a participant, beneficiary, or a class of beneficiaries on the basis of race, color, or national origin.

The CPE will act on a complaint by any individual, provided that no final action will be taken by CPE unless the ultimate beneficiary or participant acknowledges the substance of the complaint in writing. If the Title VI compliance officer determines independently that a violation of Title VI has occurred, then final action may be taken by CPE without verification by the ultimate beneficiary or participant.

C. Time Period for Filing

Complaints must be filed within one hundred eighty (180) days of the activity that prompts the filing of the complaint.

D. Required Action by CPE

Upon receipt of the complaint by an individual or at the time the compliance officer becomes independently aware of actions which may constitute a violation of Title VI, the compliance officer shall take necessary action within thirty (30) days to investigate and recommend specific actions to resolve the complaint. The compliance officer shall file a report to the President within that period.

The complainant shall be notified in writing of the results of the investigation and any actions taken.

CPE shall attempt to maintain the confidentiality of the complaint and the name of the complainant.

The President shall implement corrective actions within thirty (30) days of receipt and acceptance of a final report by the compliance officer.

VIII. COMPLIANCE

A. Notification of Title VI Requirements

Grants from the Eisenhower program are made directly to other institutions of higher education who also maintain Title VI compliance plans. Sub-recipients of the Commission on Community Volunteerism and Service grants are required to indicate on the grant form compliance with the CPE policy. Copies of the Title VI compliance plan including all appropriate forms for complaints are provided to grant sub-recipients.

B. Resolution of Complaints

CPE upon notification of a complaint by any party including the grant sub-recipient, or upon becoming aware of any violation through compliance efforts, shall attempt to secure voluntary compliance with Title VI. In the event that efforts to secure voluntary compliance are not secured with a reasonable period of time, the CPE compliance officer will notify the President in writing, of the recommended corrective action.

C. Implementation of Corrective Actions

The President will act within thirty (30) days after receipt of a recommendation by the compliance officer to implement a corrective action.

The complainant shall be notified in writing by the President or the Title VI compliance officer of the resolution of a complaint. A statement of corrective action shall include specific statements of actions to be taken or prohibited actions and shall include a timetable for implementation.

Employees or grant sub-recipients who refuse to voluntarily comply with Title VI or to take corrective actions required by CPE shall face disciplinary action, or in the case of grant subrecipients, may face termination or suspension of the grant.

IX. TRAINING

The Title VI implementation plan has been disseminated to all CPE employees involved in federal programs along with complaint procedures. Sub-recipients of grants administered by CPE are notified of the Title VI implementation plan and complaint procedures at the time of the grant award.

X. GOALS AND EVALUATION PROCEDURES

A. CPE Goals

1. Report compliance activities in a timely manner.
2. Respond to and investigate all complaints within the timeframe and in accordance with procedures outlined in Section VII.

XI. PUBLIC NOTIFICATION

Two groups of people receive notification: 1) agency employees involved in federal programs receive a copy of the implementation plan and the complaint procedures; and, 2) sub-recipients of grants administered by CPE are notified of Title VI requirements at the time of the grant award.

XII. RECORDKEEPING AND REPORTING

A. Complaints

1. The compliance officer will maintain a log of all complaints filed with CPE.
2. Grant personnel will certify annually that all sub-recipients have been notified of the Title VI implementation plan and complaint procedures.
3. The compliance officer will maintain copies of complaint forms and will ensure that they are available for use.

B. Reporting

1. Changes in the Title VI implementation plan will be provided to appropriate employees and sub-recipients as changes are made.
2. Changes in the Title VI implementation plan will be forwarded to the State Auditor as changes are made.
3. Grant personnel will maintain records of all sub-recipients in order that CPE can determine if eligible parties are participating in the grants.

XIII. MINORITY REPRESENTATION

An appointed Council pursuant to KRS 164.011 governs CPE. The Council consists of 15 members appointed by the Governor and the chief state school officer. The President is appointed by the Council and serves as the chief operating officer. The staff of the CPE serves at the pleasure of the President. Of the current membership of the CPE, one is African Americans.

The CPE appointed a Committee on Equal Opportunities to assist in desegregation related activities at public institutions of higher learning.

Currently, the CPE employs five African Americans. An affirmative action plan exists for the agency.

XIV. GLOSSARY OF COMMON TERMS

"Beneficiary or recipient" means the individual or organization for which federal funds are intended.

"CPE" means the Kentucky Council on Postsecondary Education.

"Implementation plan" means the Title VI implementation plan developed and maintained by the CPE to ensure compliance with 42 U. S. C. § 2000d et. Seq. and KRS 344.015.

"Title IV Compliance Officer" means the CPE employee designated by the President to coordinate all Title VI activities of the CPE.

XV. APPENDICES

Council on Postsecondary Education
1024 Capital Center Drive, Suite 320
Frankfort, Kentucky 40601-8204
Telephone: (502) 573-1555
Fax: (502) 573-1535

**Complaint under Title VI
The Civil Rights Act of 1964**

To Title VI Coordinator:

I _____, hereby file an official complaint against

_____ located at
Name of Persons or Agency

Date of alleged discrimination: _____

Complainant's name: _____

Complainant's address: _____

Complainant's telephone number: _____

Basis of complaint (use back of sheet if necessary):

Signed: _____

Date: _____

Council on Postsecondary Education
1024 Capital Center Drive, Suite 320
Frankfort, Kentucky 40601-8204
Telephone: (502) 573-1555
Fax: (502) 573-1535

Report of Investigation

I, _____, representing the Council on Postsecondary Education,
Title VI Coordinator

have investigated the complaint filed on _____ by _____
Date Name of Complainant

alleging that discrimination occurred which was in violation of the provisions of Title VI of the Federal Civil Rights Act.

The results of the investigation were as follows:

- _____ A. The agency or person was found to be in violation of Title VI.
- _____ B. The agency or person was not found to be in violation of Title VI.
- _____ C. The complainant withdrew the complaint.

A copy of the investigative report is attached.

Withdrawal of Complaint (if applicable) _____

If the agency or person was found to be in violation of Title VI, a brief description of the remedial action taken to assure future compliance follows:

Signed: _____

Date: _____

GENERAL GOVERNMENT CABINET
DEPARTMENT FOR LOCAL GOVERNMENT



OFFICE OF THE GOVERNOR
DEPARTMENT FOR LOCAL GOVERNMENT
FRANKFORT, KENTUCKY 40601-8204

PAUL E. PATTON
GOVERNOR

BOB ARNOLD
COMMISSIONER

June 29, 1999

The Honorable Edward B. Hatchett, Jr.
Auditor of Public Accounts
Capitol Annex, Suite 144
Frankfort, Kentucky 40601

Dear Mr. Hatchett:

Enclosed is the Department for Local Government's 1999 Title VI Implementation Plan. Also enclosed is the letter of assurances and the self-survey for this agency.

Please contact Karen Roberts at 573-2382, ext. 291, if you have questions or need further information.

Sincerely,

Tom Graham
for Bob Arnold
Commissioner

Enclosures



AN EQUAL OPPORTUNITY EMPLOYER M/F/D
1024 CAPITAL CENTER DRIVE, SUITE 340
(502) 573-2382

TDD (800) 247-2510

FAX (502) 573-1519

ASSURANCE of COMPLIANCE UNDER TITLE VI of the CIVIL RIGHTS ACT of 1964

The Department for Local Government (hereinafter called the Applicant)

HEREBY AGREES THAT it will comply with Title VI of the Civil Rights Act of 1964 (P.L. 88-352) and all requirements imposed by the Regulations of the U.S. Department of Housing & Urban Development, Department of Justice (28 CFR Parts 42 & 50), Appalachian Regional Commission, Economic Development Administration, Department of Interior, Corps of Engineers, and directives or regulations issued pursuant to that Act and the Regulations, to the effect that, no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subject to discrimination under any program or activity for which the Applicant receives Federal financial assistance from any listed Agency; and HEREBY GIVES ASSURANCE THAT it will immediately take any measures necessary to effectuate this agreement.

THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all Federal financial assistance, grants and loans of Federal funds, reimbursable expenditures, grant or donation of Federal property and interest in property, the detail of Federal personnel, the sale and lease of, and the permission to use, Federal property or interest in such property or the furnishing of services without consideration or at a nominal consideration, or at a consideration which is reduced for the purpose of assisting the recipient, or in recognition of the public interest to be serviced by such sale, lease, or furnishing of services to the recipient, or any improvements made with Federal financial assistance extended to the Applicant by any listed agency.

BY ACCEPTING THIS ASSURANCE, the applicant agrees to compile data, maintain records, and submit reports as required to permit effective enforcement of Title VI, and permit authorized Department personnel during normal working hours to review such records, books, and accounts as needed to ascertain compliance with Title VI. If there are any violations of this assurance, the Department shall have the right to seek administrative and/or judicial enforcement of this assurance.

This assurance is binding on the applicant, its successors, transferees, and assignees as long as it receives assistance from any listed agency. In the case of real property, this assurance is binding for as long as the property is used for a purpose for which this assistance was intended or for the provision of services or benefits similar to those originally intended. In the case of personal property, this assurance applies for as long as the recipient retains ownership or possession of the property. The person or persons whose signatures appear below are authorized to sign this assurance on behalf of the applicant.



Applicant

~~Commissioner~~/Deputy Commissioner

6-28-99

Date

Department for Local Government
1024 Capital Center Drive
Suite 340
Frankfort, Kentucky 40601

TITLE VI SELF-SURVEY

1. DATE OF SURVEY:	2. TYPE OF SURVEY:	INITIAL	ANNUAL X	OTHER
3. NAME OF FACILITY/AGENCY: The Department for Local Government				
ADDRESS: 1024 Capital Center Drive, Suite 340				
CITY/COUNTY/STATE/ZIP CODE: Frankfort/Franklin/Kentucky 40601				
4. NAME OF ADMINISTRATIVE HEAD: Bob Arnold				
POSITION TITLE: Commissioner				
5. NAME OF LOCAL TITLE VI COORDINATOR: Karen-Savarra Roberts				
POSITION TITLE: Federal Program Coordinator				
6. ADVISORY GROUP OR ADVISORY BOARD:				
a. WHAT IS THE RACIAL COMPOSITION OF THE ADVISORY GROUP OR GOVERNING BOARD?				
NUMBER OF MINORITIES:	2	NUMBER OF NON-MINORITIES:	2	TOTAL: 4
b. HOW ARE MEMBERS SELECTED?				
Appointed by Commissioner upon recommendation from Executive Staff				
c. ADVISORY GROUP OR BOARD MEMBERS SERVE FOR WHAT PERIOD OF TIME?				
1 Year				
d. IF NO MINORITY PERSONS ARE ON THE ADVISORY GROUP OR BOARD AND THEY REPRESENT ANY OF THE POPULATION IN THE GEOGRAPHIC SERVICE AREA, WHAT STEPS WILL BE TAKEN TO OBTAIN MINORITY REPRESENTATION ON THE ADVISORY GROUP OR BOARD?				
7. NON-DISCRIMINATION POLICIES:				DOES YOUR AGENCY HAVE A WRITTEN POLICY STATING THAT SERVICES WILL BE PROVIDED TO ALL PERSONS WITHOUT REGARD TO RACE, COLOR, OR NATIONAL ORIGIN?
	YES	X	NO	
IF YES, ATTACH A COPY, FOR INITIAL SURVEY ONLY!				
8. POSTERS:				ARE POSTERS CONTAINING TITLE VI INFORMATION PROMINENTLY DISPLAYED WITHIN THE FACILITY?
	YES	X	NO	
9. LOCAL COORDINATOR:				DO THESE POSTERS SHOW THE NAME OF THE LOCAL COORDINATOR TO WHOM COMPLAINTS SHOULD BE REFERRED?
	YES	X	NO	
10. RECORDS:				ARE PERMANENT RECORDS KEPT OF ALL TITLE VI COMPLAINTS?
	YES	X	NO	

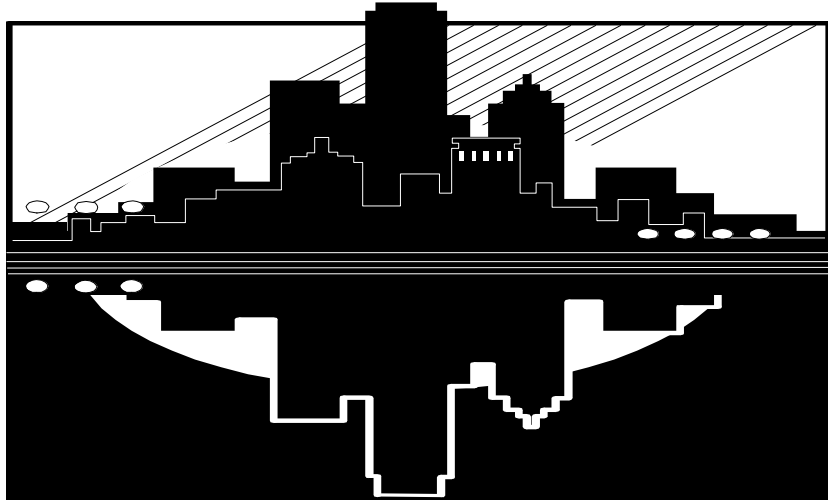
11. COMPLAINTS:					IF APPLICABLE, DESCRIBE BELOW ANY COMPLAINTS RECEIVED IN THIS REPORTING PERIOD:				
NAME OF COMPLAINT		RACE/NATIONAL ORIGIN			CHARGES(S)		FINDING(S)		
N/A									
12. DISSEMINATION:					IS TITLE VI INFORMATION DISSEMINATED TO YOUR EMPLOYEES AND YOUR CLIENTS/APPLICANTS?				
YES		X		NO					
IF YES, DESCRIBE HOW EMPLOYEES ARE INFORMED:									
Orientation Training & Annual Staff Training									
IF YES, DESCRIBE HOW CLIENTS/APPLICANTS ARE INFORMED:									
Scheduled Training (see page 14), Conferences, & Meetings									
13. APPLICANTS'/CLIENTS' RIGHTS:					ARE YOU CONFIDENT THAT APPLICANTS AND CLIENTS ARE CLEARLY AWARE OF THEIR RIGHTS UNDER TITLE VI, INCLUDING THE RIGHT TO FILE A COMPLAINT?				
YES		X		NO					
14. EMPLOYEE RESPONSIBILITIES:					ARE NEW EMPLOYEES CLEARLY INFORMED ABOUT THEIR SPECIFIC RESPONSIBILITIES TO CLIENTS UNDER TITLE VI?				
YES		X		NO					
15. REFRESHER TRAINING:					ARE STAFF MEMBERS PERIODICALLY RE-ORIENTED OR REFRESHED ON INFORMATION DETAILING THEIR TITLE VI RESPONSIBILITIES?				
YES		X		NO					
16. IF YES, STATE BY WHOM AND HOW:									
Orientation Training by the Staff Personnel Administrator									
Annual Staff Training by the Title VI Agency Coordinator									
17. COMPLIANCE ASSURANCE:					DO ALL CONTRACTS TO PROVIDE DIRECT SERVICES TO CLIENTS CONTAIN A TITLE VI STATEMENT OF COMPLIANCE?				
YES		X		NO					
IF YES, ATTACH A COPY OF THE TITLE VI STATEMENT INCLUDED IN SUCH CONTRACTS, FOR INITIAL SURVEY ONLY.									
18. RECIPIENT/VENDER AWARENESS:					ARE YOU CONFIDENT THAT EACH OF YOUR RECIPIENTS OR VENDORS, IF ANY, ARE CLEARLY AWARE OF YOUR AGENCY'S COMMITMENT TO TITLE VI?				
YES		X		NO					
19. COURTESY TITLES:					DOES A WRITTEN POLICY EXIST WHICH STATES THAT COURTESY TITLES, I.E., MR., MS., ETC., WILL BE USED BY STAFF TO ADDRESS CLIENTS WITHOUT REGARD TO RACE, COLOR, OR NATIONAL ORIGIN IN BOTH ORAL AND WRITTEN COMMUNICATIONS?				
YES		X		NO					
20. PHYSICAL AREAS:					ARE ALL PHYSICAL AREAS, I.E., EXITS, WAITING ROOMS, DINING AREAS, REST ROOMS, ETC., PROVIDED AND USED WITHOUT REGARD TO RACE, COLOR, OR NATIONAL ORIGIN OF CLIENTS?				
YES		X		NO					
IF NO, IDENTIFY THE AREAS WHICH ARE NOT USED JOINTLY AND EXPLAIN WHY.									

COMMONWEALTH OF KENTUCKY

***TITLE VI
IMPLEMENTATION
PLAN***

Department for Local Government

COMMONWEALTH OF KENTUCKY



“Leading the Commonwealth into the 21st Century”

DEPARTMENT

for

LOCAL GOVERNMENT

The Department for Local Government does not discriminate on the basis of Race, Color, National Origin, Sex, Age, Religion, Familial Status, or Disability, and provides, upon request, reasonable accommodation including auxiliary aids and services necessary to afford an individual with a disability an equal opportunity to participate in all services, programs and activities.

Commonwealth of Kentucky
Department for Local Government

IMPLEMENTATION

PLAN

for

TITLE VI

of the

CIVIL RIGHTS ACT

of

1964

Commonwealth of Kentucky
Department for Local Government

1024 Capital Center Drive
Suite 340
Frankfort, Kentucky
40601

[502] 573-2382

Fax
[502] 573-1519

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1-800-247-2510

Revised
June 1999

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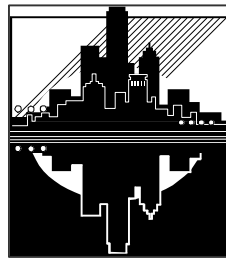
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ii CHANGES TO DLG 1999 PLAN

Changes to the DLG ~~1998~~ Title VI Implementation Plan are shown in *italic* on the right as indicated.

*1999
Changes are
indicated in this
manner.*

Grammatical changes or minor rephrasing will not be tagged.

References to required documents and/or examples in the appendixes are shown on the right as indicated.

References are
indicated in
this manner.

iii

OVERVIEW

The Department for Local Government is an independent agency of the Commonwealth attached to the Office of the Governor. The functions of the Department for Local Government revolve around its basic responsibilities to act as the technical support and service agency of state government for local units of government within the Commonwealth, serve as a clearinghouse for information, data and assistance useful to or desired by local governments. The Department also functions in a liaison capacity between the Governor and local government units in matters of activity coordination and solution of local government problems.

Title VI of the Civil Rights Act of 1964 and its implementing regulations require all state agencies receiving federal money to develop and implement plan to ensure that no one receiving benefits under a federally funded program is discriminated against on the basis of race, color, or national origin. Senate Bill 248, KRS Chapter 344.015, passed by the Kentucky General Assembly requires state agencies to develop a Title VI implementation plan with participation by protected beneficiaries as may be required by such law or regulations. To the extent applicable, such plan shall include Title VI implementation plan of any subrecipients of federal funds through the state entity. Each state governmental entity shall submit annual Title VI compliance reports and implementation plan updates to the Auditor of Public Accounts and the Human Rights Commission by July 1, 1995, and July 1 thereafter.

The Department for Local Government's implementation plan, once approved, is designed so recipients and subrecipients have the option of adopting DLG's plan or implementing their own. All recipients and subrecipients will have until July 1, 1998, to adopt or design their Title VI plan.

I MISSION STATEMENT

The purpose of Title VI of the Civil Rights Act of 1964 is to prohibit programs which receive federal funds from discriminating against participants or clients on the basis of race, color or national origin. The intent of the law is to ensure that all persons, regardless of their race, color or national origin, are allowed to participate in these federally funded programs. To ensure the Department for Local Government and its subrecipients meet their compliance responsibility, the following procedures have been established to provide for monitoring of Title VI compliance activities and complaint processing in all programs, directly or indirectly responsible to Local Government, all of which receive Federal/State funding, in whole or part.

II SCOPE

The Department for Local Government reaffirms its policies to afford all individuals the opportunity to openly participate in federal financially assisted programs and adopts the following provision:

“No person in the United States shall, on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.”

The overall responsibility for complying with the provisions of Title VI is vested in the Commissioner, Department for Local Government, who is accountable for the administration of the department and its divisions. The Commissioner shall assign an Agency Coordinator, who will be responsible for administering and monitoring the compliance procedure and Title VI complaint processing for recipients and subrecipients of the program.

Title VI prohibits the following actions for recipients of federal assistance, including cities, counties, area development districts, special districts, and any public agencies that receive federal assistance and the entities to which the Department for Local Government distribute federal assistance. Recipients either directly or through contractual means, on the grounds of race, color, or national origin, shall not:

1. Deny a person the opportunity to participate as a member of a planning or advisory body that is an integral part of the program.
2. Provide a service or benefit to an individual that is inferior (either in quantity or quality) to that provided to others in the program.
3. Provide an individual with a service or benefit in a manner different from others under the program.
4. Address an individual in a manner that denotes inferiority because of race, color, or national origin.

5. Subject an individual to segregation in any manner related to the receipt of services or benefits under the program.
6. Subject an individual to separate treatment in any manner related to receiving services or benefits under the program.
7. Restrict an individual in any way in the receipt of any advantage or privilege enjoyed by others under the program.
8. Require different standards or conditions as prerequisites for accepting an individual into a program.
9. Deny an individual any service or benefit provided under the program.
10. Use criteria or methods of administration which:
 - (a) have the effect of subjecting individuals to discrimination or,
 - (b) operate to defeat or substantially impair the accomplishment of the objectives of the program.
11. Permit discriminatory activity in a facility built in whole or in part with federal funds.
12. Fail to provide service or information in a language other than English when significant numbers of potential or actual beneficiaries are of limited English speaking ability.
13. Fail to advise the population eligible to be served or benefited by the program of the existence of the program.
14. Subject an individual to discriminatory employment practices under any federally funded program whose object is to provide employment.
15. Locate a facility in any way which would limit or impede access to a federally funded service or benefit.

III RESPONSIBLE OFFICIAL

The overall responsibility for complying with the provisions of Title VI is vested in the Commissioner, Department for Local Government, who is accountable for the administration of the department and its divisions. *The Commissioner shall not be responsible under Title VI for the actions of any Area Development District or other recipient or subrecipient not employed directly by the Commonwealth.* The Commissioner shall assign an Agency Coordinator, who will be responsible for administering the Title VI compliance procedure for recipients and subrecipients of the program. The Agency Coordinator will be responsible for the day-to-day management of the civil rights compliance efforts of the department.

Additional sentence inserted, i.e., "actions of ADDs, recipients, ..."

The Agency Coordinator for the Department for Local Government is Karen-Savarra Roberts, Federal Program Coordinator. She can be reached at 1024 Capital Center Drive, Suite 340, Frankfort, Kentucky 40601, or by phone at (502) 573-2382.

Federal Program Coordinator

Each recipient and subrecipient shall appoint a Local Coordinator to be responsible for compliance with Title VI. Each Local Coordinator will complete the Title VI Self-Survey annually. The Local Coordinator of each area development district will maintain grantee's self-surveys on file. A copy of the DLG report will be maintained on file and forwarded to the Auditor of Public Accounts no later than July 1 of each year.

*See Appendix 2
Exhibit 3*

IV STATEMENT OF ASSURANCES

Financial assistance is conditioned on the applicant providing assurances that the program or facility to be benefited shall be operated without discrimination. Although the particular form of assurance shall need to be specified by each department, in substance, the assurance is a contractual obligation through which the recipient promises to comply with Title VI regulations and will take immediate and continuing steps to effectuate this compliance. The assurance obligates the recipient for the period during which federal money is extended. In the case of real or personal property, the assurance obligates not only the recipient, but also any subsequent transferee for the period during which possession or ownership is retained, or during which the property is used for a purpose for which the property has been given. The assurance further acknowledges that the federal financial assistance is extended in reliance on the representations and agreements made in the assurance, and that the government has the right to seek its judicial enforcement.

Assurances shall be a part of all contracts extending federal financial assistance from the state agency to the state agency's subrecipients. A review of the recipient's operations shall be made within one year of the recipient's initial receipt of funds to determine compliance with the assurances.

See Appendix 2
Exhibit 1
For Sample
Assurance Form &
Explanation

V EFFECTIVE DATE

January 1, 1995, is the effective date of the Title VI implementation plan, per KRS Chapter 344.015. This plan shall be reviewed if necessary and updated annually.

State agencies which are not a recipient of federal funds on January 1, 1995, but subsequently receive federal funds shall develop and submit a Title VI plan by the following July 1.

VI IDENTIFY PROGRAM OR ACTIVITIES SUBJECT TO TITLE VI

All federal programs and coverages are listed in Appendix 4. This listing is updated within the agency and updated annually in reference to the implementation plan.

See Appendix 4

VII COMPLAINT PROCEDURES/SYSTEM

Acceptance of Complaints of Discrimination

- A. Any person alleging discrimination based on race, color, or national origin has a right to file a complaint within 180 days of the alleged discrimination. At the complainant's discretion, the complaint can be filed with the federal department, the Commission for Human Rights, or the agency providing the service. It is not necessary to know the identity of the complainant, so long as the information is sufficient to determine the identity of the recipient and if required by regulations indicates the possibility of a violation.
- B. All complaints, written or verbal, shall be accepted. In the event a complainant sets forth the allegations verbally and refuses to reduce such allegations to writing, the person to whom the complaint is made shall reduce the elements of the complaint to writing.
- C. Complaints, whether written or later reduced to writing by a staff person should contain the following information:
 - 1. Name, address, and telephone number of the complainant; if provided.
 - 2. The location and name of the entity delivering the service.
 - 3. The nature of the incident that led the complainant to feel discrimination was a factor.
 - 4. The basis of the complaint; i.e., race, color, or national origin.
 - 5. Names, addresses and phone numbers of people who may have knowledge of the event.
 - 6. The date or dates on which the alleged discriminatory event or events occurred. Forms may be developed to aid a complainant in filing a complaint, but the use of such forms should not be required for acceptance of a complaint.

See
Appendix 3
Exhibit 1

7. A complaint log shall be kept for the record and date of submission of the complaint to the proper authorities.

VIII COMPLIANCE/NONCOMPLIANCE

A. Authority.

The authority for this department to conduct compliance reviews is derived from Title VI of the Civil Rights Act of 1964 and its implementing regulation. Additionally, KRS Chapter 344.015 requires state agencies and subrecipients to develop an implementation plan for the enforcement of Title VI.

B. Types of Reviews.

1. Compliance certification. Agency officials must determine that program applicants (potential recipients who have not previously participated in a program) are in compliance with Title VI. Compliance determinations shall be made in writing and based on written information provided by the applicant. An on-site compliance review shall be conducted if the information provided is inadequate.

If the review reveals inconsistencies with the acts implementing regulations in the applicant's program, approval/disapproval action shall be deferred pending prompt remedial action on the part of the applicant to resolve the areas of noncompliance. The applicant must be notified of the areas of apparent noncompliance and given the opportunity to make timely corrective action.

2. Routine Compliance Reviews. The agency shall conduct routine compliance reviews. The selection of a particular recipient for a routine review shall be based on, but not limited to, such factors as:
 - a. A periodic assessment of compliance;
 - b. An increase in complaints;
 - c. Community patterns of discrimination;
 - d. Failure of recipient to file compliance reports or reports showing patterns of discrimination;

- e. Recipient receiving federal money under other programs and found to be in noncompliance by other agencies;
- f. Facial staffing patterns that may present a problem, and/or
- g. Previously unreviewed recipients.

C. Compliance Enforcement Plan.

Agencies shall develop written compliance enforcement plans detailing the policies and procedures for implementing compliance reviews in their program. A plan shall specify:

See
Appendix 1

- 1. The frequency and number of reviews.

Appendix 1



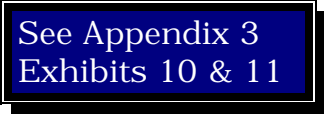
- 2. The identity of entities to be reviewed and criteria to be used in selecting entities.
- 3. A procedure for maintaining a log of reviewed entities to ensure that a sufficient number and type of reviews are completed.
- 4. Examples of noncompliance in the program.
- 5. A training plan to ensure that persons implementing Title VI compliance are competent in their duties.
- 6. That the assurance of nondiscrimination is included in all appropriate documents.
- 7. The state agency personnel responsible for monitoring civil rights issues.
- 8. That the composition of planning or advisory bodies reasonably represents program participation by race and that adequate public notification of the existence of such bodies has been made.
- 9. Record maintenance for proper lengths of time.
- 10. Procedures for the prevention and reporting of acts of retaliation or intimidation.

D. Resolution of Noncompliance.

The Civil Rights act of 1964 and regulations require that efforts be made to the fullest extent practicable to obtain voluntary compliance before there can be a refusal, suspension, or termination of federal financial assistance. However, attempts to gain compliance shall not be unduly protracted.

Probable noncompliance results when any civil rights compliance reviewer, federal or state, finds that any civil rights law or regulation is not being adhered to.

1. Procedures for Achieving Voluntary Compliance.

- a. In cases where a complaint investigation or compliance review results in findings on noncompliance, the department shall notify the recipient in writing by mail of the apparent noncompliance. The notice shall clearly identify the conditions of noncompliance and offer a reasonable time to willingly comply. 
- b. The department shall record the date the recipient received notice, and shall note and record the last day afforded the recipient for voluntary compliance before initiating an administrative process to terminate assistance.
- c. The recipient may request a meeting for the purpose of discussing the problem areas or requirement for compliance.
- d. The department head or designee shall approve the recipient's voluntary compliance plan, methods, procedures, and proposed actions if such approval shall result in compliance with the act. Such a plan shall be reduced to writing. Failure of voluntary efforts shall result in termination or suspension of assistance. 


2. Termination or Suspension of Assistance.

Any action to terminate or suspend assistance shall be limited to a particular recipient against whom finding of noncompliance has been made and shall be limited in its effect to the particular program, or part thereof, in which noncompliance has been found.

General conditions for termination or suspension of assistance shall not become effective until the following conditions have been met:

- a. The department has advised the recipient of its failure to comply and it has been determined that compliance cannot be secured through voluntary means.
- b. There is a documented finding that after opportunity for a hearing, the recipient has failed to comply with the requirements of Title VI and applicable state and federal regulations.
- b. The department head has given approval.

IX TRAINING

Staff of this agency and all subrecipients will receive orientation regarding the obligations and rights involved in the Title VI program. This training will be conducted throughout the year of 1999. Also, as individual subrecipients request specialized training in a particular area, Title VI orientation and training will be conducted.

State County Officials Training for Judge/Executives, Magistrates, Commissioners, and County Attorneys was conducted between December 9, 1998, and January 20, 1999 throughout the state. Newly Elected County Clerks and County Sheriffs received training between December 14 and December 17, 1998. County Budget Workshops were conducted from February 16 and March 3, 1999. The Kentucky League of Cities Legislative Committee Meeting in March 1999. The Conference on the Management of Local Governments was held in April. A Conference for the Training of Kentucky City Clerks on the Manual Budget was also

*Local
Government
Training
12/1998
1-5/1999
10/99*

*ADDs in
March*

conducted in April. Title VI requirements were specifically covered. The 15 Area Development Districts received a block of training on Title VI during the monthly meeting in March 1999. Community Development Block Grant Guidelines Training was conducted in May, Title VI training was contained as well as Grant Administrator Certification Training to be conducted in October. Technical assistance will be offered as necessary to CDBG recipients.

*CDBG Guideline &
Grant Administrator
Certification Training*

In-service training programs for all employees will continually apprise staff of their responsibility to render a high quality of services to all clients regardless of their race, color, or national origin. Once initial orientation has been conducted throughout the state, the Agency Coordinator will become responsible for the conduct of Title VI training as an on-going project.

X GOALS AND EVALUATION PROCEDURES

For the purpose of monitoring compliance activities, the Department for Local Government has included Title VI compliance audits into its established audit schedule, which includes all subrecipients being audited on an annual basis. The Department also maintains a committee that meets to review the audits and all filed complaints during the period. Any recipient or subrecipient not found in compliance with the implementation plan is notified and rescheduled for an additional audit before year's end. Any significant problems are forwarded to the Commissioner with findings and recommendations.

XI PUBLIC NOTIFICATION/OUTREACH

This Department and its secondary recipients shall inform the public, particularly those eligible for programs, about all available services under Title VI.

This Department and its secondary recipients shall:

- A. Take positive and specific action to advise minorities of program availability by using such means of communication as newspaper articles.
- B. Display nondiscrimination posters, which can be ordered cost-free from the Commission on Human Rights, the Heyburn Building, Suite 700, 332 West Broadway, Louisville, Kentucky 40202 or call toll-free 1-800-292-5566.
- C. Inform eligible persons of new programs or changes in existing programs pertaining to eligibility benefits and services, including the location of local facilities or service delivery points and hours of service, by informing minority and grass roots organizations in the target area.
- D. Include civil rights requirements in all guidelines. Make guidelines available to the public.
- E. Provide access to Title VI information to beneficiaries, potential beneficiaries, and applicants, including procedures for filing complaints, program information, and rights of beneficiaries and applicants as reflected in legislation, program regulations, directives, materials, pamphlets, etc.
- F. Include in any published program information a statement that the program is available to all without regard to race, color, or national origin. This statement shall be in bold type and in a prominent location.
- G. All materials shall list the designated office or contact person(s) for distribution.

Commission on
Human Rights
1-800-292-5566

XII RECORDKEEPING/REPORTING

Accurate and comprehensive data collection and reporting is vital in determining whether state agencies are complying with Title VI.

A. Data Collection and Reporting Requirements.

This department shall provide for and maintain a system to collect, analyze, and report the eligible population and participation data by race for each program on an annual basis, and define parity of program in advance of the program year. The analysis shall be used to determine how effectively programs are reaching eligible groups; assist in the selection of locations for compliance reviews; identify areas for additional outreach efforts; and provide status reports to measure progress of program delivery. The system shall also provide report data on compliance review conducted. All data shall be based on reviewable records.

See Paragraph D,
Page 18 for
Information on Parity

A data collection program shall contain the following:

1. Provide for the establishment and maintenance of a system for collecting and reporting participation data for each program by service delivery point.
2. Develop a system defining parity of participation for minority groups and establish specific participation targets in each program on an annual basis.

B. Determining the Eligible Population.

The population eligible to participate in a program shall be identified by racial/ethnic category for each service delivery point. The information can be derived from standard statistical sources such as the federal census, census of agriculture, population and housing, records from other agencies (both state and federal) and such documented estimates, which give a valid indication of potential beneficiaries. Eligible population data should be established for a base year and updated annually or when source documents are updated.

C. Collecting and Reporting Participation Data.

Systems for collecting and reporting racial/ethnic data should be established immediately and maintained. Such systems shall ensure the following:

1. Data will be collected and retained at the service delivery point for each program for reporting to state and federal agencies.
2. Data will be based on reviewable records and maintained in accordance with the records retention schedule developed by the State Archives and Records Commission and applicable federal agency requirements.
3. Data will be maintained under safeguards to prevent its use for discriminatory purposes.

D. Equal Opportunity Evaluation Report.

1. A comparison of actual racial/ethnic participation to the eligible racial/ethnic population for each program by service delivery point.
2. Service delivery points where the proportion of minority participation is below the proportion of nonminority participation.
3. An explanation of changes in data which reflect apparent inequities in the delivery of benefits.
4. Actions to be taken with those service delivery points where minority participation is below the established target or the proportion of nonminority participation.
5. Achievements made in the prior year in reaching more eligible participants.
6. Examination of recipient program staffing patterns to determine if staffing patterns indicate possible discrimination in program delivery on the basis of race, color or national origin.

E. Program Targets.

Program targets for the delivery of program benefits to minority groups should be developed and incorporated into planning procedures. Targets shall be as follows:

1. Define parity of participation for minority groups in each program by service delivery point; and
2. Establish specific participation targets by racial/ethnic category for each program by service delivery point.

XIII MINORITY REPRESENTATION ON PLANNING BOARD AND/OR ADVISORY BODY

Whenever a planning or advisory body, such as a board or a committee is an integral part of the recipients program, the facility or agency shall take such steps as are necessary to ensure that minorities are notified of the existence of such bodies and are provided equal opportunity to participate as members.

Where members of the board or committee are appointed by the facility and where minorities reside in the surrounding community, the facility or agency must appoint a minority representative to serve on the board or committee.

The Department for Local Government has established an Advisory Board with members appointed by the Commissioner. This body meets quarterly to assess compliance reviews from subrecipients and any agency complaints received. The make-up of this department's Advisory Board is shown on the following page.

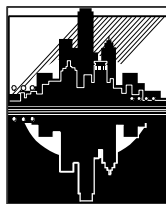
**COMMONWEALTH OF KENTUCKY
DEPARTMENT FOR LOCAL GOVERNMENT
TITLE VI ADVISORY BOARD**

June 1, 1999

PERSONNEL

NAME	TITLE	RACE/NATIONAL ORIGIN/SEX
Karen Roberts Chairperson	Federal Program Coordinator	Native American Female
Bob Leonard Member	Local Government Branch Manager	White Male
Mike Hale Member	Federal Program Coordinator	African-American Male
Beth Mills Member	Local Government Advisor Chief	White Female

Glossary of Terms



XIV GLOSSARY OF TERMS

Area Development Districts (ADDs)	Regional planning and development organizations in which counties and cities work together to accomplish common goals and receive shared benefits.
Assurance	A written statement or contractual agreement signed by the agency head in which a recipient agrees to administer federally assisted programs in accordance with civil rights laws and regulations.
Beneficiaries	Those persons to whom assistance, services, or benefits are ultimately provided.
Civil Rights Compliance Reviews	Regular systematic inspections of agency programs conducted to determine regulatory compliance with civil rights laws and regulations. Compliance reviews determine compliance and noncompliance in the delivery of benefits and services in federally-assisted programs. These reviews help to measure the effectiveness of the agency's civil rights programs. They identify problems, such as denial of full benefits, barriers to participation, different treatment, lack of selection to advisory boards and planning committees, lack of information, and denial of the right to file a civil rights complaint. Compliance reviews may be conducted on-site or through desk audits.
Complaints	A verbal or written allegation of discrimination which indicates that any federally assisted program is operated in such a manner that it results in disparity of treatment to persons or groups of persons because of race, color, or national origin.

Compliance	The fulfillment of the requirements of Title VI, other applicable laws, implementing regulations, and instructions to the extent that no distinctions are made in the delivery of any service or benefit on the basis of race, color, or national origin. (See also <i>conciliatory agreement</i> and <i>noncompliance</i> .)
Compliance Certification	Submission of a Statement of Assurance and/or any other submitted information dictated by the funding agency that indicates the program or facility will be operated in a manner that will ensure program benefits will be equally available to all eligible persons without regard to race, color, or national origin. Documentation will be examined and verified during a post-award review.
Conciliatory Agreement	A voluntary agreement between a federal agency and the state, or between the state and a subrecipient that provides for corrective action to be taken by a recipient to eliminate discrimination in any program receiving federal assistance.
Contractor	A person or entity that agrees to perform services at a specified price.
Desk Audit	A desk audit is a structured paper review of statistical and narrative information submitted by recipients or agency program offices of compliance information obtained before or without going on-site, conducted according to review procedures. Desk audits include routine reviews of assurance forms or other documents to ensure that they have been properly completed.
Discrimination	To make any distinction between one person or group of persons and others, either intentionally, by neglect, or by the effect of actions or lack of actions based on race, color, or national origin.
Federal Assistance	Any funding, property, or aid provided for the purpose of assisting a beneficiary.

Minority	A person or groups of persons differing from others in some characteristics and often subjected to differential treatment on the basis of race, color, or national origin.
Noncompliance	Failure or refusal to comply with Title VI of the Civil Rights Act of 1964, other applicable civil rights law, and implementing departmental regulations. (See compliance.)
Parity	The proportion of minority participation to the minority eligible population of a service delivery point is the same as the proportion of non-minority participation to the non-minority eligible population of the same delivery point.
Post-Award Review	A routine inspection of agency programs during and after federal assistance has been provided to the beneficiary or recipient. These reviews may be cyclical or based on a priority system contingent upon the potential for non-compliance in individual programs. Reviews are normally conducted through on-site visits; however desk audits and other mechanisms may also be used to assess operation of federally assisted programs. A post-award review may result in a written report that shows the compliance status of agency program offices and recipients. When necessary, the report will contain recommendations for corrective action. If the program office or recipient is found to be in noncompliance, technical assistance and guidance must be provided to bring the recipient into voluntary compliance. If voluntary compliance cannot be secured, formal enforcement action is then initiated.
Potential Beneficiaries	Those persons who are eligible to receive federally assisted program benefits and services.
Public Notification	Process of publicizing information on the availability of programs, services and benefits to minorities with statements of nondiscrimination.

Recipient

This is attained through use of newspapers, newsletters, periodicals, radio and television, community organizations, grassroots and special needs directories, brochures, and pamphlets.

Service Delivery Area

Any state, political subdivision of any state, or instrumentality of any state or political subdivision, any public or private agency, institution, or organization, or other entity to whom federal financial assistance is tended, directly or through another recipient, for any program, including any successor, assignee, or transferee thereof, but not including any ultimate beneficiary under such a program.

Service Delivery Point

The area served by a service delivery point in the administration of federally assisted programs.

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d-4

The place in which federally assisted program services or benefits are administered to the public.

Federal law prohibiting discrimination based on race, color, or national origin. It covers all forms of federal aid except contracts of insurance and guaranty. It does not cover employment, except where employment practices result in discrimination against program beneficiaries or where the purpose of the federal assistance is to provide employment.

APPENDIX 1

Conducting Compliance Reviews & Complaint Investigations

CONDUCTING REVIEWS & COMPLAINT INVESTIGATIONS

Complaint and routine compliance reviews have many features in common. Following is a discussion of the steps necessary to conduct a thorough field investigation. Some of the types may or may not be relevant depending on the type of investigations being conducted.

- I. Compliance Reviews of Service Delivery Point Operations shall cover at a minimum:
 - A. Files and Records Examination. Examine files and records for content, form, and length of time retained.
 - B. Interviews. As appropriate, conduct interviews with beneficiaries, potential beneficiaries, and denied applicants. In addition, develop contacts with local minority and/or grass root organizations to determine the community's view of the service delivery point.
 - C. Employment Conditions. Determine through interviews and personal observation whether the racial/ethnic composition of the staff is adversely affecting minority participation. Obtain data on the racial composition of the work force and incorporate the information into the review report.
 - D. Public Notification. Determine if public notification efforts are adequate. Determine if public notification efforts are effective in increasing program participation.
 - E. Complaints. Determine if procedures used by the service delivery point in handling complaints are consistent with the procedures outlined in the department's compliance manual.
 - F. Collection of Data. Determine the level of minority participation and compare it to the number of potentially eligible participants by racial/ethnic category. Determine the reason for any inconsistency.

- G. Equal Access of Physical Facilities. Observe whether all facilities are made available and used on a nondiscriminatory basis.
 - H. Location. Determine whether or not the location of the service delivery point unnecessarily denies access to any persons on the basis of prohibited discrimination.
 - I. Lawsuits. Determine whether there are any lawsuits alleging discrimination on the basis of race, color, or national origin filed against the recipient.
 - J. Other Federal Assistance. Ascertain whether the recipient is receiving assistance from other federal agencies. If so, determine the purpose of the assistance. If not, determine whether the recipient has applied but was found in noncompliance. If the recipient was found in noncompliance, document it in the report.
 - K. Civil Rights Compliance Reviews. Determine whether any civil rights compliance reviews have been conducted on the recipient in the last two years. If so, review the findings and corrective actions taken.
- II. Compliance Review Selection Criteria. The following are suggested criteria that establish the need for a review:
- A. Data analysis that indicates if the recipient has complied with Title VI.
 - B. Discrimination complaints against an individual recipient.
 - C. Recipients receiving federal assistance under other programs that are found in noncompliance by other agencies.
 - D. Insufficient or inadequate information from an agency report to support a determination of Title VI compliance.
 - E. Racial/ethnic disparities.

- F. A racial/ethnic staffing pattern which may indicate inadequate numbers of bilingual employees for the population of the area served.
- G. Findings from previous reviews.
- H. Previously unreviewed recipients.
- I. New program recipients.

III. Organization and Conduct of the Review.

A. Compliance Review Preparation and Planning.

When a decision is made to review a particular recipient for compliance, the reviewer begins the preliminary preparation. Such preparation includes:

1. Coordination with other government agencies which may have parallel Title VI responsibilities. To ensure proper coordination and consideration of Title VI evaluations performed by other governmental agencies, it shall not be necessary to perform a compliance evaluation if another government agency has completed such an evaluation within the past 12 months. In such instances, proper documentation of the previous compliance review should be obtained and maintained in project files.
2. A review of files to determine program applicant or recipient background information including the number of employees and participants and their racial/ethnic composition, nature of services provided, previous review results, data on service area economy, population, percent of minorities in the service area, and minority or grass root organizations in the service area, if any.
3. A review of compliance status in recipient's other federally assisted programs.

4. Information or profiles from such agencies as the U.S. Commission on Civil Rights, EEOC, Community Services Administration, Office of Federal Contract Compliance, and from local civil rights organizations.

B. Scope of Compliance Review.

The scope of the review will be influenced by whether the review is routine or special in nature. Once the scope of the review is determined, the reviewer should determine if an announced or unannounced review will be conducted. If an unannounced review is conducted, state the reason for the unannounced visit in the review report. In announced reviews, the reviewer sends a letter to the recipient advising that a review is scheduled and arranges for further coordination.

See Exhibits 13 & 14 for
Sample Letters

C. Conduct of the Reviewers.

Compliance reviewers are representatives of their department and the state. Reviewers should conduct themselves in a courteous and professional manner. It is the reviewer's responsibility to:

1. Inform the recipient reviewed of the purpose and scope of the review, of planned contacts outside the recipient's premises, and take any other actions that will generate trust and rapport; set a constructive tone, and explain that the main purpose of the review is to determine compliance with Title VI;
2. Be objective and impartial during the conduct of the investigation;
3. Be courteous, empathetic, and informed. Do not get into arguments;

4. Be positive and honest when answering questions. Avoid trying to intimidate or coerce the recipient;
5. Be thorough in the collection and presentation of evidence and maintain working papers in a manner that accurately records the who, what, when, where, why and how, of the matter;
6. Be sensitive to efforts to discredit the reviewer or the review;
7. Never discuss findings except with those responsible for the recipient's operation. Note the discussions of findings in the review report; and
8. Discuss the deficiencies and recommendations during the exit interview with the recipient from a prepared statement. The recipient's comments during the exit interview should be included in the review report.

D. Interviews.

Interviews are an important part of compliance reviews and should be conducted in person. If telephone interviews are used, they should be followed up by a personal interview, if possible.

See Exhibit 15 for
Sample Letter

1. Persons to be interviewed. Carefully select people to be interviewed, taking into consideration the following:
 - a. What information is desired and who is most likely to have that information;
 - b. That compliance reviews should reflect the views of the recipient, the public, program eligibles, beneficiaries, applicants, and those denied benefits or services. Also, they should include views of assistance and advocacy organizations, as well as, other government entities, which normally have knowledge of the community and the recipient's operation.

2. Identify needed information. Prepare questions to secure needed information.
3. Ensure adequacy of information. Note the identity, address, relationship to program, or category of each person interviewed. If allegations of discrimination are made, obtain names of witnesses if possible. Note opinions, general impressions, and reactions, but identify them as such.
4. Conduct of interview. The following are suggestions for conducting an interview with a complainant, recipient employee, or other relevant person.
 - a. Show official identification and explain the purpose of the review;
 - b. Note the identity and address of the interviewee;
 - c. Conduct the interview in private. Anything said should be for the record, but information provided can be noted without attributing it to the interviewee;
 - d. Seek clarification, confirmation, and supportive data if the interviewee makes any statements that imply noncompliance on the part of the recipient;
 - e. Ask the interviewee for an over all opinion or impression of the recipient's operations, treatment of beneficiaries, and assessment of affording equal opportunity;

- f. Ask if the interviewee knows of any person who has a civil rights complaint against the recipient and obtain information that will permit contacting such person;
 - g. Give the interviewee the opportunity to volunteer any information or observations regarding possible noncompliance;
 - h. Provide the interviewee with an address and phone number prior to leaving in case additional information comes to mind after the interview.
- 5. Records must be examined during a compliance review. These may include, but are not limited to;
 - a. Administrative records. Examine the recipient's files to determine if copies of assurances, public notification plan, press releases, letters, training materials, etc., are available at the location.
 - b. Data Collection Records. Examine the data collection records available at the site.
 - c. Monitoring Records. Examine the files of the recipient and determine if they have adequate documentation for monitoring secondary recipients. At a minimum, such records should include an assurance, records related to compliance review (if recipient has its own subrecipients), findings and corrective actions taken, participation data and other record keeping data, civil rights guideline or directives, and documents regarding public notification.
 - d. Program Benefit Records. Examine the program participation records. Determine whether data regarding participation, eligibles, etc., indicates disparity of participation that can be identified along racial or ethnic lines.

- e. Board Minutes. Where recipients' policies and actions are determined by a board or governing body, the minutes of such body should be reviewed and copies of relevant sections made and marked.
- f. Policy v. Practice. Investigators should inquire as to the official policy of the recipient and copy should be obtained for the final report. The investigators should also request written or oral explanations of the recipient's practice in all aspects of its programs, which are subject to the investigation.

Make copies of relevant records for the working papers. Note date received, custodian of the records, name of the investigator, and, if part of a larger document, the title of the document.

To identify civil rights problem areas, particular person or group of persons must have been treated in an identifiably different manner from persons or groups not of the same race, color, or national origin. Statistical (participation, time between application, and receipt of benefits, etc.) samples based on race or ethnic background may be compared to determine whether the averages show disparity of treatment. Items, which may be compared, include the amount and quality of benefits, timeliness, incidence of denials, or pending cases. This is not a comprehensive list.

- 6. Working Papers. Report conclusions and recommendations should be substantiated by evidence that is clearly reflected in the working papers. Working papers should be kept for at least three years after the case is closed. The following guidelines will be useful in the preparation of working papers:
 - a. Completeness and Accuracy. Working papers should be complete and accurate to provide support for finding, conclusions, and recommendations and to enable demonstration of the nature and scope of the work.

- b. Clarity and Understandability. Working papers should be clear and understandable without supplementary explanations. The information contained in them should be clear, complete, and concise. Anyone should be able to determine their purpose, the nature of the work done, and the reviewer's conclusion.
 - c. Legibility and Neatness. Working papers should be neat and legible to ensure their worth as evidence.
 - d. Relevance. The information contained in the working papers should be restricted to matters, which are important, pertinent, and useful to the objectives established for the review.
 - e. Substantive Proof. Evidence should be sufficient to reflect the essential elements of a finding, prove possible violation exists, or reflect probable noncompliance. It should identify the persons or entities responsible, corrective action taken by the recipient, the responsiveness in correcting deficiencies, the recipient's general attitude toward compliance, or any other information necessary to substantiate the findings.
7. Closing Conference. Arrange for a closing conference with the recipient. The conference should be conducted in a positive and constructive manner. The following steps are suggested for the conduct of the conference:
- a. State the scope and purpose of the review. State how the review was conducted, how many interviews were conducted, what records were examined, etc.
 - b. State the authority for the review.

- c. If a routine review, state how the recipient was selected.
 - d. Read findings to the recipient. Clearly state that findings may be further evaluated. As a result, some findings may be disregarded.
 - e. Allow the recipient to comment or produce evidence refuting the findings. Note the comments or explanation and accept for the record any documentation provided. The rebuttal should be reviewed and reconciled with conflicting evidence.
 - f. Explain that findings are subject to further review prior to the final report, and that disagreements can be aired and negotiated at a later date.
 - g. Offer to accept any written documentation or rebuttal within a certain time frame, and state that such written comments will be appended to the report.
 - h. Ask the recipient if there are any other questions.
8. Compliance Review Reports.
- a. Be concise, clear and comprehensive so that the users understand the report.
 - b. Present factual matter accurately, completely, and fairly.
 - c. Present findings and conclusions objectively, clearly, and simply.
 - d. Include only factual information that can be supported by the documentation in the working papers.

- e. Place emphasis on improvement rather than on criticism of the past.
 - f. Identify and explain issues and questions needing further study or consideration.
 - g. Clearly explain the scope and objectives of the review.
9. Compliance Review Report Format. The compliance review report format should include the following:
- a. Summary
 - b. Background Information
 - c. General Information
 - d. Persons Interviewed
 - e. Records Reviewed
 - f. Staffing patterns
 - g. Analysis
 - h. Recommendations

See Exhibit 16 for
Checklist

APPENDIX 2

Required Document Exhibits

ASSURANCE OF COMPLIANCE UNDER TITLE VI of the CIVIL RIGHTS ACT of 1964

The Department for Local Government (hereinafter called the Applicant)

HEREBY AGREES THAT it will comply with Title VI of the Civil Rights Act of 1964 (P.L. 88-352) and all requirements imposed by the Regulations of the U.S. Department of Housing & Urban Development, Department of Justice (28 CFR Parts 42 & 50), Appalachian Regional Commission, Economic Development Administration, Department of Interior, Corps of Engineers, and directives or regulations issued pursuant to that Act and the Regulations, to the effect that, no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subject to discrimination under any program or activity for which the Applicant receives Federal financial assistance from any listed Agency; and HEREBY GIVES ASSURANCE THAT it will immediately take any measures necessary to effectuate this agreement.

THIS ASSURANCE is given in consideration of and for the purpose of obtaining any and all Federal financial assistance, grants and loans of Federal funds, reimbursable expenditures, grant or donation of Federal property and interest in property, the detail of Federal personnel, the sale and lease of, and the permission to use, Federal property or interest in such property or the furnishing of services without consideration or at a nominal consideration, or at a consideration which is reduced for the purpose of assisting the recipient, or in recognition of the public interest to be serviced by such sale, lease, or furnishing of services to the recipient, or any improvements made with Federal financial assistance extended to the Applicant by any listed agency.

BY ACCEPTING THIS ASSURANCE, the applicant agrees to compile data, maintain records, and submit reports as required to permit effective enforcement of Title VI, and permit authorized Department personnel during normal working hours to review such records, books, and accounts as needed to ascertain compliance with Title VI. If there are any violations of this assurance, the Department shall have the right to seek administrative and/or judicial enforcement of this assurance.

This assurance is binding on the applicant, its successors, transferees, and assignees as long as it receives assistance from any listed agency. In the case of real property, this assurance is binding for as long as the property is used for a purpose for which this assistance was intended or for the provision of services or benefits similar to those originally intended. In the case of personal property, this assurance applies for as long as the recipient retains ownership or possession of the property. The person or persons whose signatures appear below are authorized to sign this assurance on behalf of the applicant.

Applicant
Commissioner/Deputy Commissioner
(Title of Authorized Official)

Date

Department for Local Government
1024 Capital Center Drive
Suite 340
Frankfort, Kentucky 40601
(Address of Applicant)

Explanation of Sample Assurance Form

Federal regulations require each agency to obtain an assurance from each applicant for assistance. This document is a recommended sample of such an assurance. Applicants shall obtain comparable written assurances of compliance from their subgrantees, contractors, and subcontractors. See explanation, questions 9 and 12.

1. By executing the assurance, what does an applicant agree to do?

The applicant agrees to make no distinction on the ground of race, color, or national origin in providing to individuals any service, financial aid, or other benefit under any program receiving federal financial assistance extended to the applicant by the department. The applicant further agrees to provide actual racial/ethnic data of its applicants and participants.

2. What is meant by "distinction on the ground of race, color, or national origin"?

"Distinction on the ground of race, color, or national origin," includes (1) any type of segregation, separate or different treatment, or other discrimination on that ground; (2) the imposition of any admission, enrollment quota, eligibility, or other requirement or condition which individuals must meet in order to be provided any service, financial aid, or other benefit under a program or to be afforded an opportunity to participate in a program, if the race, color, or national origin of individuals is considered in determining whether they meet any such requirement or condition; (3) the use of membership in a group as a basis for the selection of individuals for any purpose, if in selected members of the group there is discrimination on the ground of race, color, or national origin; and (4) the assignment of personnel to provide services, or the assignment of time or places for the provision of services, on the basis of the race, color, or national origin of the individuals to be served.

3. What does "service, financial aid, or other benefit" mean?

"Service, financial aid, or other benefit" under a program receiving federal financial assistance includes any assistance made available to individuals: (1) with the aid of federal financial assistance; or (2) with the aid of the applicant's or other non-federal funds required to be made available for the program as a condition to the receipt of federal financial assistance; or (3) in or through a facility provided with the aid of federal financial assistance or the non-federal matching funds referred to in (2).

4. What requirements are placed on the use of facilities?

The applicant agrees to make no distinction on the ground of race, color, or national origin in making available to individuals the use of any land, building, equipment, or other facility leased, acquired, constructed, improved, or equipped with the aid of federal financial assistance extended to the applicant by the department including:

- (a) The use of any room, dormitory, ward, or other space in the facility;
- (b) The use of any equipment or facility;
- (c) The use of any office, waiting room, restroom, eating, recreational, concession, or other accommodation or convenience provided in the facility;
- (d) The use of any facility not provided with the aid of federal financial assistance if the availability of such facility is required as a condition to the receipt of federal financial assistance for the federally-assisted facility.

5. What requirements are placed on the opportunities to participate in a program receiving federal assistance?

The applicant agrees to make no distinction on the ground of race, color, or national origin in affording opportunities to individuals to participate (other than as employees) in any program receiving federal financial assistance extended by the department to the applicant, including opportunities to participate:

- (a) As providers of service, financial aid, or other benefits;
- (b) As conferees, observers, consultants, advisors, or as members of advisory or planning groups; or
- (c) As volunteers.

6. Does that mean that an applicant who signs the department's assurance may nevertheless make distinctions among his employees on the basis of race, color, or national origin?

Title VI of the Civil Rights Act prohibits employment discrimination when it affects the delivery of program benefits or when the purpose of the program is to provide employment. Moreover, even when this is not the case, an applicant may be precluded from engaging in any discriminatory employment practices under the provisions of Title VI of the Civil Rights Act, other civil rights laws, and the merit system requirements.

7. When an applicant's employment practices are covered by the department's regulation, which requirements must be met?

The applicant agrees to make no distinction on the ground of race, color, or national origin, in its employment practices with respect to individuals seeking employment or employed under any program receiving federal financial assistance extended to the applicant by the department.

8. Does the assurance of nondiscrimination apply to the entire operation of an institution?

Yes, the assurance applies to the entire operation of an institution with certain limited exceptions.

9. If an applicant intends to make use of other individuals to help carry out the federally-assisted program, does the requirement not to discriminate apply to such a subgrantee, contractor, or subcontractor?

It does. The applicant must require any individual, organization, or other entity which it utilizes, to which it subgrants, or with which it contracts or subcontracts or otherwise arranges to provide services, financial aid, or other benefits under, or to assist it in the conduct of, any program receiving federal financial assistance extended to the applicant by the department, or with which it contracts or otherwise arranges for the use of any facility provided with the aid of federal financial assistance for a purpose of which the federal financial assistance was extended, to comply fully with Title VI of the Civil Rights Act of 1964 and the regulations of the department.

10. Must this assurance of nondiscrimination by the subgrantee, etc., be in writing?

In the case: (1) of any contractual or other arrangement with another such individual or entity which will continue for an indefinite period or for a period of more than three months; (2) of any subgrant; or (3) of any conveyance, lease, or other transfer of any real property or structures thereon provided with the aid of federal financial assistance extended to the applicant by the department, the applicant shall obtain from such other person, subgrantee, contractor or subcontractor, an agreement, in writing, enforceable by the applicant and by the department, that such other individual or entity, subgrantee, contractor, or subcontractor will carry out its functions under such subgrant, or contractual or other arrangement, or will use the transferred property, as the case may be, in accordance with Title VI of the Act and the department regulations.

11. What obligation does the applicant have to inform beneficiaries, participants, and others of the provisions of the regulations?

The applicant must make available to beneficiaries, participants, and other interested persons information regarding the provisions of the department regulations and protections against discrimination provided under Title VI of the Civil Rights Act of 1964.

12. What obligations does the applicant have to keep records and to make them available to the department?

The applicant shall keep such records and submit to the department timely, complete, and accurate compliance reports at such times, and in such form, and containing such information as the department may determine to be necessary to ascertain whether the applicant has complied or is complying with the regulations in this part. The applicant shall permit access by authorized employees of this department during normal business hours to such of its books, records, accounts, and other sources of information, and its facilities as may be pertinent to ascertain compliance with the regulations in this part. Where any information required of an applicant is in the exclusive possession of any other subgrantee, institution, or person, and this subgrantee, institution, or person shall fail to or refuse to furnish this information, the applicant shall set forth what efforts it has made to obtain the information.

13. Must separate assurance forms be filed with each application?

As a general rule once a valid assurance is given, it will apply to any further application as long as there is no indication of a failure to comply.

TITLE VI CHECKLIST

RECIPIENT				DATE			
REVIEWER				TITLE			
I. LOCAL GOVERNMENT EMPLOYMENT							
A. PERSONNEL POLICIES				YES		NO	
1. POLICIES CONTAIN PROVISIONS FOR:							
a) HIRING				YES		NO	
b) TRAINING				YES		NO	
c) PROMOTIONS				YES		NO	
d) DEMOTIONS				YES		NO	
e) DISMISSALS				YES		NO	
2. DATE OF ADOPTION							
3. IF POLICIES ARE NOT AVAILABLE, WHAT ARE THE PROCEDURES FOR EACH ACTION NOTED ABOVE?							
4. HOW LONG ARE APPLICATIONS KEPT ON FILE?							
COMMENTS:							
B. EMPLOYMENT RECORDS MAINTAINED INDICATING THE FOLLOWING EMPLOYEE INFORMATION:							
1. SEX		YES		NO			
2. RACE		YES		NO			
3. DISABILITY		YES		NO			
4. NATIONAL ORIGIN		YES		NO			
5. AGE (Birth Date)		YES		NO			
6. JOB CLASSIFICATION		YES		NO			
7. SALARY		YES		NO			
8. DATE HIRED		YES		NO			
9. DATE PROMOTED		YES		NO			
10. DATE TERMINATED		YES		NO			
C. TOTAL NUMBER OF EMPLOYEES							
TOTAL NUMBER OF FEMALES							
TOTAL NUMBER OF MALES							

D. AFFIRMATIVE ACTION PLAN (OPTIONAL REQUIREMENT):											
1. DOES LOCALITY HAVE AN AAP?					YES		NO				
2. DATE ADOPTED											
3. GOALS & TIMETABLES?					YES		NO				
4. TIMETABLE LENGTH											
4. BASED ON REVIEW OF EMPLOYMENT RECORDS, CAN AN AAP BE RECOMMENDED?					YES		NO				
COMMENTS:											
II. PROGRAM BENEFITS											
A. HAS A TITLE VI SELF-SURVEY BEEN COMPLETED?					YES		NO				
DATE											
B. HAS A TITLE VI PLAN BEEN ADOPTED?					YES		NO				
DATE											
1. ADOPTED DLG PLAN?					YES		NO				
2. DEVELOPED & ADOPTED OWN PLAN?					YES		NO				
C. HAS A TITLE VI COORDINATOR BEEN APPOINTED?					YES		NO				
NAME											
D. DOES LOCALITY/GRANTEE MAINTAIN PROGRAM BENEFIT RECORDS BY ACTIVITY?					YES		NO				
1. PROGRAM BENEFIT FORMS MAINTAINED FOR INDIVIDUALS BY:											
a. MINORITY GROUP STATUS		YES		NO		c. AGE		YES		NO	
b. SEX		YES		NO		d. DISABILITY		YES		NO	
		e. FEMALE HEAD OF HOUSEHOLD			YES		NO				
2. IS SUPPORTING DOCUMENTATION ON FILE?								YES		NO	
3. TYPE OF DOCUMENTATION (SURVEYS, CENSUS, PROGRAM PARTICIPATION RECORDS):											
4. IS A CIVIL RIGHTS/EQUAL OPPORTUNITY POSTER PROMINENTLY DISPLAYED?					YES		NO				

TITLE VI SELF-SURVEY

1. DATE OF SURVEY:		2. TYPE OF SURVEY:		INITIAL	ANNUAL	OTHER
3. NAME OF FACILITY/AGENCY:						
ADDRESS:						
CITY/COUNTY/STATE/ZIP CODE:						
4. NAME OF ADMINISTRATIVE HEAD:						
POSITION TITLE:						
5. NAME OF LOCAL TITLE VI COORDINATOR:						
POSITION TITLE:						
6. ADVISORY GROUP OR ADVISORY BOARD:						
a. WHAT IS THE RACIAL COMPOSITION OF THE ADVISORY GROUP OR GOVERNING BOARD?						
NUMBER OF MINORITIES:		NUMBER OF NON-MINORITIES:			TOTAL:	
b. HOW ARE MEMBERS SELECTED?						
c. ADVISORY GROUP OR BOARD MEMBERS SERVE FOR WHAT PERIOD OF TIME?						
d. IF NO MINORITY PERSONS ARE ON THE ADVISORY GROUP OR BOARD AND THEY REPRESENT ANY OF THE POPULATION IN THE GEOGRAPHIC SERVICE AREA, WHAT STEPS WILL BE TAKEN TO OBTAIN MINORITY REPRESENTATION ON THE ADVISORY GROUP OR BOARD?						
7. NON-DISCRIMINATION POLICIES:				DOES YOUR AGENCY HAVE A WRITTEN POLICY STATING THAT SERVICES WILL BE PROVIDED TO ALL PERSONS WITHOUT REGARD TO RACE, COLOR, OR NATIONAL ORIGIN?		
	YES		NO			
IF YES, ATTACH A COPY, FOR INITIAL SURVEY ONLY!						
8. POSTERS:				ARE POSTERS CONTAINING TITLE VI INFORMATION PROMINENTLY DISPLAYED WITHIN THE FACILITY?		
	YES		NO			
9. LOCAL COORDINATOR:				DO THESE POSTERS SHOW THE NAME OF THE LOCAL COORDINATOR TO WHOM COMPLAINTS SHOULD BE REFERRED?		
	YES		NO			
10. RECORDS:				ARE PERMANENT RECORDS KEPT OF ALL TITLE VI COMPLAINTS?		
	YES		NO			

11. COMPLAINTS:					IF APPLICABLE, DESCRIBE BELOW ANY COMPLAINTS RECEIVED IN THIS REPORTING PERIOD:
NAME OF COMPLAINT		RACE/NATIONAL ORIGIN		CHARGES(S)	FINDING(S)
12. DISSEMINATION:					IS TITLE VI INFORMATION DISSEMINATED TO YOUR EMPLOYEES AND YOUR CLIENTS/APPLICANTS?
YES		NO			
IF YES, DESCRIBE HOW EMPLOYEES ARE INFORMED:					
IF YES, DESCRIBE HOW CLIENTS/APPLICANTS ARE INFORMED:					
13. APPLICANTS'/CLIENTS' RIGHTS:					ARE YOU CONFIDENT THAT APPLICANTS AND CLIENTS ARE CLEARLY AWARE OF THEIR RIGHTS UNDER TITLE VI, INCLUDING THE RIGHT TO FILE A COMPLAINT?
YES		NO			
14. EMPLOYEE RESPONSIBILITIES:					ARE NEW EMPLOYEES CLEARLY INFORMED ABOUT THEIR SPECIFIC RESPONSIBILITIES TO CLIENTS UNDER TITLE VI?
YES		NO			
15. REFRESHER TRAINING:					ARE STAFF MEMBERS PERIODICALLY RE-ORIENTED OR REFRESHED ON INFORMATION DETAILING THEIR TITLE VI RESPONSIBILITIES?
YES		NO			
16. IF YES, STATE BY WHOM AND HOW:					
17. COMPLIANCE ASSURANCE:					DO ALL CONTRACTS TO PROVIDE DIRECT SERVICES TO CLIENTS CONTAIN A TITLE VI STATEMENT OF COMPLIANCE?
YES		NO			
IF YES, ATTACH A COPY OF THE TITLE VI STATEMENT INCLUDED IN SUCH CONTRACTS, FOR INITIAL SURVEY ONLY!					
18. RECIPIENT/VENDER AWARENESS:					ARE YOU CONFIDENT THAT EACH OF YOUR RECIPIENTS OR VENDORS, IF ANY, ARE CLEARLY AWARE OF YOUR AGENCY'S COMMITMENT TO TITLE VI?
YES		NO			
19. COURTESY TITLES:					DOES A WRITTEN POLICY EXIST WHICH STATES THAT COURTESY TITLES (I.E., MR., MS., ETC.) WILL BE USED BY STAFF TO ADDRESS CLIENTS WITHOUT REGARD TO RACE, COLOR, OR NATIONAL ORIGIN IN BOTH ORAL AND WRITTEN COMMUNICATIONS?
YES		NO			
20. PHYSICAL AREAS:					ARE ALL PHYSICAL AREAS I.E., EXITS, WAITING ROOMS, DINING AREAS, REST ROOMS, ETC., PROVIDED AND USED WITHOUT REGARD TO RACE, COLOR, OR NATIONAL ORIGIN OF CLIENTS?
YES		NO			
IF NO, IDENTIFY THE AREAS WHICH ARE NOT USED JOINTLY AND EXPLAIN WHY.					

APPENDIX 3

Exhibits

EXHIBIT 1

Discrimination Complaint Form

NOTE: WE ARE ASKING FOR THE FOLLOWING INFORMATION TO ASSIST US IN PROCESSING YOUR COMPLAINT. IF YOU NEED HELP IN COMPLETING THIS FORM PLEASE LET US KNOW.

1. COMPLAINANT'S NAME (IF PROVIDED):			
ADDRESS			
CITY/STATE/ZIP CODE			
TELEPHONE NUMBER (HOME)			
TELEPHONE NUMBER (BUSINESS)			
2. PERSON DISCRIMINATED AGAINST (IF SOMEONE OTHER THAN THE COMPLAINANT)			
NAME			
ADDRESS			
3. WHAT IS THE NAME AND LOCATION OF THE INSTITUTION OR AGENCY THAT YOU BELIEVE DISCRIMINATED AGAINST YOU?			
NAME			
ADDRESS			
CITY/STATE/ZIP CODE			
TELEPHONE NUMBER			
4. WHICH OF THE FOLLOWING BEST DESCRIBES THE REASON YOU BELIEVE THE DISCRIMINATION TOOK PLACE? WAS IT BECAUSE OF YOUR:			
a. RACE/COLOR (SPECIFY)			
b. NATIONAL ORIGIN (SPECIFY)			
5. WHAT DATE DID THE ALLEGED DISCRIMINATION TAKE PLACE?			
6. IN YOUR OWN WORDS, DESCRIBE THE ALLEGED DISCRIMINATION. EXPLAIN WHAT HAPPENED AND WHO YOU BELIEVE WAS RESPONSIBLE (IF ADDITIONAL SPACE IS NEEDED, ADD A SHEET).			
7. HAVE YOU TRIED TO RESOLVE THIS COMPLAINT THROUGH THE INTERNAL GRIEVANCE PROCEDURE AT THE INSTITUTION OR AGENCY?		YES	NO

IF YES, WHAT IS THE STATUS OF THE GRIEVANCE?				
NAME AND TITLE OF THE PERSON WHO IS HANDLING THE GRIEVANCE PROCEDURE AT THE INSTITUTION OR AGENCY.				
NAME				
TITLE				
8. HAVE YOU FILED THIS COMPLAINT WITH ANY OTHER FEDERAL, STATE, OR LOCAL AGENCY, OR WITH ANY FEDERAL OR STATE COURT?		YES		NO
IF YES, CHECK ALL THAT APPLY:		FEDERAL AGENCY		STATE AGENCY
		FEDERAL COURT		STATE COURT
				LOCAL AGENCY
PLEASE PROVIDE INFORMATION ABOUT A CONTACT PERSON AT THE AGENCY/COURT WHERE THE COMPLAINT WAS FILED.				
NAME				
ADDRESS				
CITY/STATE/ZIP CODE				
TELEPHONE NUMBER				
9. DO YOU INTEND TO FILE THIS COMPLAINT WITH ANOTHER AGENCY?		YES		NO
IF YES, WHEN AND WHERE DO YOU PLAN TO FILE THE COMPLAINT?				
DATE				
AGENCY				
ADDRESS				
CITY/STATE/ZIP CODE				
TELEPHONE NUMBER				
10. HAS THIS COMPLAINT BEEN FILED WITH THIS AGENCY BEFORE?		YES		NO
IF YES, WHEN? DATE		YES		NO
11. HAVE YOU FILED ANY OTHER COMPLAINTS WITH THIS AGENCY?		YES		NO
IF YES, WHEN AND AGAINST WHOM WERE THEY FILED?				
DATE				
AGENCY				
ADDRESS				
CITY/STATE/ZIP CODE				
TELEPHONE NUMBER				

12. GIVE A BRIEF DESCRIPTION OF THE OTHER COMPLAINT.	
13. WHAT IS THE STATUS OF THE OTHER COMPLAINT?	
14. PLEASE SIGN BELOW. YOU MAY ATTACH ANY WRITTEN MATERIALS OR OTHER INFORMATION THAT YOU THINK IS RELEVANT TO YOUR COMPLAINT.	
COMPLAINANT'S SIGNATURE	
DATE	
ATTACHMENTS (PLEASE SPECIFY)	

EXHIBIT 2

SAMPLE: Letter Acknowledging Receipt of a Complaint Under Title VI

Ms. Joanne Doe
President, Some County
_____ Chapter NAACP
P.O. Box 333
Somewhere, Kentucky

Dear Ms. Doe:

This is to acknowledge receipt of your complaint alleging denial of participation of minorities in the _____ Program in Anytown. Consistent with program procedures, your complaint is being forwarded to the _____ for further investigation. A representative

(federal agency)
from this agency will be contacting you to discuss the details of this allegation in the very near future.

Thank you for notifying us of your concern regarding this program. Should you have any questions prior to the representative of the federal agency contacting you, please feel free to contact my office by telephoning 502/555-5555, or writing to me at the above address.

Sincerely,

Appropriate Official

EXHIBIT 3

SAMPLE: Second Letter to Complainant

Ms. Joanne Doe
President, Some County
_____ Chapter NAACP
P.O. Box 333
Somewhere, Kentucky

Dear Ms. Doe:

Your complaint of _____(date) alleging denial of participation of minorities in the _____ Program of Anytown has been directed to this office.

Your complaint has been reviewed. In preparation for a possible investigation, we would like to discuss the matters stated in your letter with you by telephone. Please send a telephone number and state a time between the hours of 8:00 a.m. and 4:30 p.m. when it would be convenient for a member of my staff to call you.

Sincerely,

Appropriate Official

EXHIBIT 4

SAMPLE: Investigator's Worksheet

CASE NAME		CASE NUMBER	
FOR COMPLAINT INVESTIGATION			
THE COMPLAINANT(S)			
NAME:			
ADDRESS:			
TELEPHONE (HOME)			
TELEPHONE (WORK)			
TELEPHONE (OTHER)			
HOURS COMPLAINANT SAYS CONVENIENT TO CALL			A.M.
DATE COMPLAINT RECEIVED			P.M.
COMPLAINANT ALLEGES DISCRIMINATION BASED ON:		RACE	NATIONAL ORIGIN
		COLOR	SEX*
		<small>*APPLICABLE FOR SECTION 109, HCDA 1974, ONLY</small>	
DATE OF LAST COMPLAINT INVESTIGATION			
FOR COMPLIANCE REVIEW			
DATE WHEN COMPLIANCE REVIEW WAS SCHEDULED			
REASON WHY COMPLIANCE REVIEW IS SCHEDULED			
OFFICE REQUESTING COMPLIANCE REVIEW			
DATE OF LAST COMPLIANCE REVIEW			
SIGNATURE OF INVESTIGATOR		DATE	
TITLE OF INVESTIGATOR		AGENCY	
ADDRESS			
CITY/STATE/ZIP CODE			
OFFICE TELEPHONE #			

EXHIBIT 5

SAMPLE: Letter Notifying Complainant of an Investigation

Mr. John Doe
1234 Main Street
Somewhere, Kentucky

Dear Mr. Doe:

The matter referenced in your letter of _____ (date) alleging racial discrimination in the operation of _____ Program will be investigated by staff from this office. The investigation has been scheduled for the week of _____ (date). Mr. James Smith has been assigned to investigate the matter. He will contact you to establish a convenient time for you to discuss your complaint with him.

We appreciate your help in this important matter.

Sincerely,

Appropriate Official

EXHIBIT 6

SAMPLE: Letter Notifying Complainant of Title VI Compliance Status of Respondent

Mr. John Doe
1234 Main Street
Somewhere, Kentucky

Dear Mr. Doe:

The matters referenced in your complaint of _____(date) alleging racial discrimination in the operation of _____ Program have been investigated by staff from this office. You may be contacted by this office or by the federal authorities should we require any further information.

My staff found several apparent violations of Title VI of the Civil Rights Act of 1964, including those mentioned in your letter. Efforts are underway to correct these deficiencies.

Thank you for bringing this important matter to our attention. You were extremely helpful during our review of the program.

Sincerely,

Appropriate Official

EXHIBIT 7

SAMPLE: Letter Advising Complainant that the Complaint is not Substantiated

Ms. Joanne Doe
1964 Main Street
Somewhere, Kentucky

Dear Ms. Doe:

The matters referenced in your letter of complaint of _____(date), alleging racial discrimination in the operation of _____ Program, have been investigated by staff from this office.

The results of the investigation did not indicate that the provisions of Title VI of the Civil Rights Act of 1964 had in fact been violated. As you know, Title VI prohibits discrimination based on race, color, or national origin in any programs receiving federal financial assistance.

My staff has analyzed the materials and facts gathered during their investigation of your complaint. We did not find evidence that any of these laws have been violated.

We must therefore advise you that your complaint has not been substantiated, and that we are closing this matter in our files.

Thank you for taking the time to write to this office. If we can be of assistance to you in the future, do not hesitate to call us.

Sincerely,

Appropriate Official

EXHIBIT 8

SAMPLE: Letter Notifying Recipient of Apparent Noncompliance with Title VI

Mr. John Doe, Executive Director
Department of Blank
Louisville, Kentucky

Dear Mr. Doe:

Departmental regulations implementing Title VI of the Civil Rights Act of 1964 provide for a periodic review of the practices of recipients of federal assistance to determine whether they are complying with nondiscrimination requirements of Title VI.

As you know, staff from this office conducted such a review of your program during the week of _____(date). From this review, the staff determined that the program was administered and (or) operated in apparent noncompliance with Title VI and the department's implementing regulation, in the following areas:

1. [Statement indicating areas of noncompliance/discrimination.]
2. [Another statement indicating areas of noncompliance/discrimination.]

It is the policy of this department that all persons benefit and participate in federally financed programs on a nondiscriminatory basis. Your program receives federal financial assistance from this department and must adhere to departmental policy as well as the requirements of Title VI. Therefore, within 30 days from the date of this letter, please advise me: (1) whether and how the program intends to immediately voluntarily comply with Title VI; or (2) whether you wish to submit for our review and approval a plan or method for compliance with Title VI. Your program will be afforded 60 calendar days from the date of this letter for preparation of this plan. You may request staff from this office to advise you during preparation of the plan.

If you do not choose voluntarily to bring the program into compliance and implement a plan to accomplish the purpose of Title VI within 60 calendar days from the date of this letter, it will be necessary for this office to begin administrative procedures necessary to insure compliance by your program and/or seek termination of federal assistance for your program. Additionally, it will be necessary for this office to refer the matter to the proper federal department with a recommendation that the federal department begin administrative proceedings pursuant to Section 602 of Title VI of the Civil Rights Act of 1964.

I hope you will be able to furnish and implement the necessary plan so there will be no need for administrative proceedings. Please call me if you need advice on this matter.

Sincerely,

Appropriate Official

EXHIBIT 9

SAMPLE: Voluntary Compliance Agreement Format

Voluntary Compliance Agreement

Subject of Review:

Name, address and telephone number of organization
Official in charge

Review information:

Name(s) of Reviewers
Date(s) of Review
Type(s) of Review
Reviewing Agency

Summary of Finding(s) and Recommendation(s) for Corrective Action:

Corrective Action(s) Taken or Proposed to be Taken:

Official in Charge of Recipient Reviewed/Date	Reviewer/Date
---	---------------

Office of Civil Rights & Equal Employment Opportunity/Date	
---	--

EXHIBIT 10

SAMPLE: Letter Accepting a Plan for Voluntary Compliance with Title VI

Mr. John Doe
Executive Director
Department of Blank
Lexington, Kentucky

Dear Mr. Doe:

Thank you for your letter of _____(date) in which you submitted a plan for compliance with Title VI of the Civil Rights Act of 1964.

Under that plan, it is our understanding that steps will be taken to:

- Example.
- Example.
- Example.

We are keeping a copy of your plan on file in our office. In addition, we have forwarded a copy to _____(appropriate federal department) in Washington, D. C. The plan you submitted has been approved by this office. It appears that the implementation of this plan should eliminate the racial discrimination in the program and that you will be in compliance with Title VI of the Civil Rights Act of 1964. As long as this is the case, you will remain eligible to receive financial assistance from this department.

Thank you for your cooperation in this matter. Please call anytime we can be of assistance to you.

Sincerely,

Appropriate Official

EXHIBIT 11

SAMPLE: Letter Rejecting a Plan for Voluntary Compliance with Title VI

Mr. John Doe
Executive Director
Department of Blank
Covington, Kentucky

Dear Mr. Doe:

The plan submitted by your program on _____(date) does not meet the requirements of Title VI of the Civil Rights Act of 1964, or the departmental Title VI regulations. Your plan does not offer a method to address certain items of concern previously discussed.

Our regulation requires the initiation of the administrative hearing process whenever there is a failure to comply with the requirements of Title VI. Steps have been taken to initiate the administrative hearing process which could lead to the termination of federal financial assistance from this Department. You will hear from our office soon concerning this.

We regret that this action must be taken. Please advise this office if you reconsider your position. We will be happy to assist you in your effort to resolve these matters through voluntary compliance.

Sincerely,

Appropriate Official

EXHIBIT 12

SAMPLE: Letter Announcing a Compliance Review

Mr. John Doe
Executive Director
Department of Blank
Louisville, Kentucky

Dear Mr. Doe:

Departmental regulations implementing Title VI of the Civil Rights Act of 1964 (copy enclosed) provide for a periodic review of the practices of recipients of federal assistance to determine whether they are complying with nondiscrimination requirements of Title VI.

Recipients are selected for compliance reviews on the basis of population and racial character of their locality; existence, size, and nature of community programs; date of last compliance review; complaints, etc. Your program, among others in your area, has been selected.

Members of our staff will conduct the review. Their present schedule will permit them to visit your program during the week of _____ (dates). Please advise us promptly by telephone if that time is inconvenient for you or your staff. You may confirm this time, or suggest another, by calling Ms. Joanna Smith at 502/555/5555.

I appreciate your cooperation in this important matter.

Sincerely,

Appropriate Official

EXHIBIT 13

SAMPLE: Letter Announcing a Complaint Investigation

Mr. John Doe
Executive Director
Department of Blank
Lexington, Kentucky

Dear Mr. Doe:

Departmental regulations implementing Title VI of the Civil Rights Act of 1964 (copy enclosed) provide for a prompt investigation whenever a complaint or any other information indicates a possible failure to comply with Title VI or its implementing regulation. A complaint has been filed in this office which indicates a possible failure to comply with Title VI in the operation of the Department of Blank.

Members of our office will conduct an investigation of this matter. Their present schedule will permit them to visit your program during the week of _____ (dates). Please advise us promptly if that time is convenient for you and your staff. You may confirm this time, or suggest another, by calling Ms. Joanna Smith of my staff at 502/555-5555.

Please be assured of my appreciation of your cooperation in this important matter.

Sincerely,

Appropriate Official

EXHIBIT 14

SAMPLE: Letter Confirming a Compliance Review

Mr. John Doe
Executive Director
Department of Blank
Covington, Kentucky

Dear Mr. Doe:

This is to confirm the conversation between you and a member of my staff in which it was agreed that staff from this office would conduct an on-site review of the _____ Program to determine its compliance with Title VI of the Civil Rights Act of 1964.

The staff member assigned to conduct the investigation of your program is James Smith. Mr. Smith and a team of investigators will be in your city Monday, March 24. They expect to arrive at your office at 9:30 a.m. on Monday.

In order to facilitate our review, and minimize our on-site staff time, please have available for our visit the following records and/or information as applicable:

1. All records and assurances required to be maintained by your office for compliance with Title VI and its implementing rules and regulations;
2. Racial breakdown of participants in all projects administered by your program;
3. A description of the program's application processing system;
4. A compilation of the program's staff assignments by race, sex, title, and salary and a copy of the program's current personnel policy;
5. A description of grievance procedures now being used by your program.

Investigators may also need access to other records and personnel. I appreciate your making these available to them as required.

Thank you for your cooperation in this important matter.

Sincerely,

Appropriate Official

APPENDIX 4

Department for Local Government Project Register

Auditor of Public Accounts Note: The project register submitted by the Department for Local Government included additional information, such as a breakdown of the source of funds (federal/state/other) for each project. Due to space considerations, only the State/DLG Identifier, Project Title, and Funding Agency are presented here. The complete project register can be viewed at the Auditor of Public Accounts Office.

Federal Grant Readiness Analysis, and Notification Tracking System
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STATE/DLG IDENTIFIER	PROJECT TITLE	FUNDING AGENCY
KY – 0001	CAMP WILDCAT PRESERVATION FOUNDATIO	NPS
KY 990104 – 0002	KET PUBLIC TELECOMMUNICATIONS FACILITIE	DOC
KY 990104 – 0003	RUSSELLVILLE WATER TREATMENT PLANT/DI	CDBG
KY 990104 – 0004	PRESERVATION OF FORT HENRY & ASSOCIAT	DOI
KY 990105 – 0005	KTC99-001 CAPITAL IMPROVEMENT PROGRAM	FTA
KY 990105 – 0006	KTC99-002 STATEWIDE GRANT FOR RURAL PU	FTA
KY 990105 – 0007	KTC99-003 STATEWIDE TRANSPORTATION PLA	FTA
KY 990105 – 0008	KTC99-004 CAPITAL IMPROVEMENT	FTA
KY 990105 – 0009	KTC 99-005 TRANSPORTATION REVERSE COM	FTA
KY 990111 – 0010	GREEN RIVER ELECTRIC CORPORATION IRP P	AGRIC, RUS
KY 990111 – 0011	ROWEN COUNTY DOMESTIC VIOLENCE UNIT	DOJ
KY 990111 – 0012	BEECH FORK WATER COMMISSION RAW WATE	REC
KY 990111 – 0013	KENTUCKY STOP PROGRAM	DOJ
KY 990111 – 0014		
KY 990111 – 0015	CITY OF SHELBYVILL FIRE SUB STATION PROJ	AGRIC,RD
KY 990113 – 0016	NEW POST OFFICE CITY OF CAMPTON, WOLFE	USPS
KY 990113 – 0017	LOUISVILLE, KY – SPRINGHURST BRANCH 4024	USPS
KY 990113 – 0018	EKU PUBLIC TELECOMMUNICATION FACILITIE	DOC
KY 990302 – 0019	MEADE COUNTY 21 ST CENTURY COMMUNITY L	EDUC
KY 990113 – 0019	WHITELY PARK APARTMENTS	RD
KY 990114 – 0020	WKU PUBLIC TELECOMMUNICATIONS FACILITI	DOI
KY 990114 – 0021	GREATER DAYTON PUBLIC TELEVISION, INC P	DOI
KY 990114 – 0022	MAYFIELD MANOR II APARTMENTS	USDA, RD
KY 990114 – 0023	APPALSHOP, INC. PUBLIC TELECOMMUNICATI	DOI
KY 990114 – 0024	KENTUCKY PUBLIC RADIO PUBLIC TELECOMM	DOC
KY 990114 – 0025	THE GREATER CINCINNATI TELEVISION EDUCA	DOC
KY 990114 – 0026	GREAT AMERICAN PHOTOGRAPHY WEEKEND	RDA
KY 990120 – 0027	BRECKINRIDGE-GRAYSON PROGRAMS, INC. HE	HHS
KY 990120 – 0028	BRECKINRIDGE EARLY HEAD START	HHS
KY 990120 – 0029	KENTUCKY HIGHLANDS VENTURE CAPITAL FU	RECD
KY 990120 – 0030	MILL SPRINGS CIVIL WATER BATTLEFIELD AR	DOI
KY 990120 – 0031	MILL SPRINGS BATTLEFIELD DRIVING TOUR P	DOT
KY 990122 – 0032	MIDDLESBOROUGH AIRPORT BOARD TEA-21 P	DOT
KY 990122 – 0033	WESTERN KENTUCKY MEDICAL EXAMINER FO	DOJ
KY 990122 – 0034	DEPARTMENT OF AGRICULTURE FSMIP PROJE	USDA
KY 990122 – 0035	HAYDON STEEL SERVICES, INC.	CDBG
KY 990122 – 0036	CLEAN VESSEL ACT	F&W
KY 990122 – 0037	PITTSBURG TANK & TOWER COMPANY ELEVA	AGRIC
KY 990126 – 0038	ALBANY POLICE DEPARTMENT COPS UNIVERS	DOJ
KY 990126 – 0039	NEW POST OFFICE FACILITY WILLIAMSBURG,	USPS
KY 990126 – 0040	DAWSON SPRINGS STREETSCAPES ENHANCEM	DOT
KY 990128 – 0041	SHELBY COUNTY SHERRIF OFFICE COPS UNIV	DOJ
KY 990128 – 0042	MACED STRATEGIC CAPITAL FUND	RD
KY 990128 – 0043	CITY OF MAYSVILLE RELOCATION OF UTILITIE	DOT
KY 990128 – 0044	CITY OF MAYSVILLE HARRIET BEECHER STOW	DOT
KY 990128 – 0045	OLD MASON COUNTY JAIL RESTORATION	DOT

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KY 990128 – 0046	RIBBON LIGHTING FOR THE SIMON KENTON B	DOT
KY 990128 – 0047	CITY OF FLEMINGSBURG UNDERGROUND UTIL	DOT
KY 990128 – 0048	FLEMING COUNTY MUSEUM RESTORATION	DOT
KY 990128 – 0049	NREPC, KENTUCKY HAZARDOUS WASTE MAN	EPA
KY 990129 – 0050	PORT BELLEVUE	CDBG
KY 990129 – 0051	99CFC-001 INDEPENDENT LIVING PROGRAM	HHS
KY 990129 – 0052	TAYLOR COUNTY ECONOMIC EXPANSION	CDBG
KY 990201 – 0053	BIG LAUREL, KY 40808-9998 MAIN POST OFFIC	USPS
KY 990201 – 0054	CITY OF SALT LICK VOLUNTEER FIRE DEPART	RD
KY 990201 – 0055	DAWSON SPRINGS COPS UNIVERSAL HIRING P	DOJ
KY 990201 – 0056	LOGAN COUNTY SHERIFF OFFICE COPS UNIVE	DOJ
KY 990202 – 0057	MEDICAID FRAUD AND ABUSE CONTROL	HHS
KY 990202 – 0058	CITY OF WILLIAMSTOWN SIDEWALK PROJECT	DOT
KY 990202 – 0059	HEALTH HELP, INC. COMMUNITY HEATH CEN	HHS
KY 990202 – 0060	BOYD COUNTY HEAD START PA 22	HHS
KY 990202 – 0061	BULLITT COUNTY COPS UNIVERSAL HIRING PR	DOJ
KY 990205 – 0062	NEW POST OFFICE FACILITY COLUMBIA, KENT	USPS
KY 990205 – 0063	GREEN RIVER CAMP PROJECT	CDBG
KY 990208 – 0064	NEW POST OFFICE FACILITY DANVILLE, KENT	USPS
KY 990208 – 0065	PURCHASE AREA HOUSING PRESERVATION P	RD
KY 990208 – 0066	ROGERS SCHOLARS PROGRAM	ARC
KY 990208 – 0067	CONSERVATION RESERVE PROGRAM	USDA
KY 990208 – 0068	VOLUNTEER FIRE ASSISTANCE GRANT	USDA
KY 990208 – 0069	COOPERATIVE FORESTRY ASSISTANCE-CONS	USDA
KY 990208 – 0070	L65001 CITY OF CRITTENDEN SPEAR PROJECT	EPA
KY 990211 – 0071	BRECKINRIDGE HEADSTART COLA	HHS
KY 990211 – 0072	PROVIDENCE BOARD OF EDUCATION 21 ST CE	EDUC
KY 990211 – 0073	CHRISTIAN COUNTY BILINGUAL EDUCATION: P	EDUC
KY 990212 – 0074	CLOVERPORT BOARD OF EDUCATION HEAD S	HHS
KY 990212 – 0075	99-CHS-001 CONTINUATION OF SUPPORT SERV	HHS
KY 990217 – 0076	BRACKEN COUNTY WATER SYSTEM IMPROVE	RD
KY 990217 – 0077	UK COMMUNITY POLICING PROGRAM	DOJ
KY 990217 – 0078	KCEOC HEAD START: COLA	HHS
KY 990217 – 0079	KENTON COUNTY AIRPORT IMPROVEMENT PR	FAA
KY 990218 – 0080	PADUCAH, KENTUCKY 42001-9998 BRIDGE STR	USPS
KY 990218 – 0081	CITY OF DRY RIDGE EXTENSION OF THE CITY'S	RD
KY 990218 – 0082	L.K.L.P. COMMUNITY ACTION COUNCIL HEAD S	HHS
KY 990218 – 0083	DISASTER RESISTANT COMMUNITY MITIGATIO	FEMA
KY 990219 – 0084	NKU WOMEN'S EDUCATIONAL EQUITY ACT PR	EDUC
KY 990219 – 0085	ECONOMIC DEVELOPMENT & ARC JOINT FUND	ARC, EDA
KY 990224 – 0086	MOREHEAD YOUTH DEVELOPMENT CENTER E	DOJ
KY 990224 – 0087	UK PAR-99-032 EXTRAMURAL RESEARCH FACI	NIH
KY 990224 – 0088	NORTHERN KY COMMUNITY ACTION COMMISSI	HHS
KY 990224 – 0089	DEER VIEW MART	RECD
KY 990224 – 0090	KEEP KENTUCKY CLEAN PROJECT	EPA
KY 990225 – 0091	BELL-WHITLEY COMMUNITY ACTION AGENCY,	HHS
KY 990225 – 0092	CITY OF HINDMAN SEWER IMPROVEMENTS PR	KIA

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KY 990225 – 0093	HART COUNTY SOLID WASTE PROJECT	EPA
KY 990226 – 0094	LAUREL COUNTY PUBLIC SCHOOL 21 ST CENTU	EDUC
KY 990226 – 0095	KY-SPIN, INC. PARENT INFORMATION & TRAINI	EDUC
KY 990226 – 0096	CLARK COUNTY 21 ST CENTURY COMMUNITY L	EDUC
KY 990226 – 0097	KNOX COUNTY HEALTH DEPARTMENT BEST B	HHS
KY 990226 – 0098	LETCHER COUNTY 21 ST CENTURY COMMUNIT	EDUC
KY 990301 – 0099	NATIONAL TECHNOLOGICAL UNIVERSITY PUB	DOI
KY 990301 – 0100	OWSLEY COUNTY BOARD OF EDUCATION 21 ST	EDUC
KY 990301 – 0101	PROJECT HOPE	EDUC
KY 990301 – 0102	JEFFERSON COUNTY FOREIGN LANGUAGE AS	EDUC
KY 990301 – 0103	LAWRENCE COUNTY 21 ST CENTURY COMMUNI	EDUC
KY 990301 – 0104	PULASKI COUNTY COMMUNITY LEARNING CEN	EDUC
KY 990301 – 0105	GRAYSON COUNTY 21 ST CENTURY COMMUNIT	EDUC
KY 990301 – 0106	HENDERSON COUNTY 21 ST CENTURY COMMU	EDUC
KY 990301 – 0107	BOYLE COUNTY STARS PROJECT	EDUC
KY 990301 – 0108	BRAIN INJURY SERVICES: CHARTING OUR FUT	HHS
KY 990301 – 0109	BRECKINRIDGE CO. THE LIGHTED SCHOOLHO	EDUC
KY 990301 – 0110	THE JAMES B. HAGGIN MEMORIAL HOSPITAL	HHS
KY 990301 – 0111	ROBERT W. COMBS ELEMENTRAY SCHOOL 21	EDUC
KY 990302 – 0112	BELLEFONTE MANOR	HUD
KY 990302 – 0113	MONTGOMERY COUNTY 21 CENTURY COMM	EDUC
KY 990302 – 0114	JCHIPS EMTRANSED PROJECT	HHS
KY 990302 – 0115	DAYTON 21 ST CENTURY COMMUNITY LEARNIN	EDUC
KY 990302 – 0116	CORBIN INDEPENDENT SCHOOL REACH PRO	EDUC
KY 990302 – 0117	OHIO COUNTY 21 ST CENTURY COMMUNITY LE	EDUC
KY 990302 – 0118	JEFFERSON COUNTY PUBLIC SCHOOLS 21 ST	EDUC
KY 990302 – 0120	OWENSBORO PUBLIC SCHOOL 21 ST CENTURY	EDUC
KY 990302 – 0121	OLDHAM COUNTY 21 ST CENTURY COMMUNITY	EDUC
KY 990302 – 0122	OHIO VALLEY EDUCATIONAL COOPERATIVE 21	EDUC
KY 990302 – 0123	WHITLEY PARK APARTMENTS	RD
KY 990305 – 0124	FAMILY SELF SUFFICIENCY CENTER	HUD
KY 990305 – 0125	GREEN RIVER REGIONAL EDUCATIONAL COOP	EDUC
KY 990305 – 0126	PADUCAH AREA COMMUNITY REUSE ORGANIZ	DOE
KY 990305 – 0127	FOUR A'S LEARNING CENTER	EDUC
KY 990305 – 0128	THE KENTUCKY DEVELOPMENT FOUNDATION	USDA
KY 990305 – 0129	JOINING HANDS	EDUC
KY 990305 – 0130	DENNIS WOOTON ELEMENTARY: THE EAGLE'S	EDUC
KY 990305 – 0131	BATH COUNTY 21 ST CENTURY COMMUNITY LE	EDUC
KY 990305 – 0132	14 TH JUDICIAL CIRCUIT DRUG COURT GRANT	DOJ
KY 990305 – 0133	27 TH JUDICIAL CIRCUIT DRUG COURT GRANT	DOJ
KY 990305 – 0134	22 ND JUDICIAL CIRCUIT DRUG COURT GRANT	DOJ
KY 990305 – 0135	AOC DRUG COURT GRANT PROGRAM PART III	DOJ
KY 990305 – 0136	OWSLEY COUNTY ACTION TEAM PURCHASE B	ARC
KY 990305 – 0137	LINCOLN COUNTY 21ST CENTURY COMMUNITY	EDUC
KY 990305 – 0138	PINEVILLE COMMUNITY LEARNING CENTER	EDUC
KY 990305 – 0139	UNION COUNTY STARS	EDUC

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KY 990305 – 0140	KENTUCKY JUSTICE CABINET VOI/TIS GRANT	DOJ
KY 990310 – 0141	CITY OF LONDON SOLID WASTE REVOLVING L	EPA
KY 990310 – 0142	COMMUNITY ACTION OF SOUTHERN KENTUCK	HHS
KY 990310 – 0143	KENTUCKY VALLEY EDUCATIONAL COOP A.C.	EDUC
KY 990310 – 0144	BRECKINRIDGE COUNTY HEAD START QUALIT	HHS
KY 990310 – 0145	ROCKCASTLE COUNTY 21 ST CENTURY COMM	EDUC
KY 990310 – 0146	APPALACIAN COLLEGE ASSOC. TELECOMMUN	DOI
KY 990310 – 0147	MIAMI EQUITY ASSOCIATES, INC. EAC PROJE	EDUC
KY 990310 – 0148	PIKE COUNTY 21ST CENTURY COMMUNITY LE	EDUC
KY 990312 – 0149	UNITED WAY OF THE BLUEGRASS TELECOMM	DOI
KY 990312 – 0150	LITTLE SOUTH/TRI COMMUNITY WATER EXPAN	ARC
KY 990312 – 0151	THE KENTUCKY DEAF TELELINK ACCESS PRO	DOI
KY 990312 – 0152	TEXSTYLE, INC. BUSINESS & INDUSTRY PROJE	RECD
KY 990312 – 0153	GEORGETOWN WATER AND SEWER SERVICES	EPA
KY 990312 – 0154	U OF L COMMUNITY NETWORKING “EMPOWER	DOI
KY 990312 – 0155	FLEMING COUNTY 911 SYSTEM IMPLEMENTATI	DOI
KY 990312 – 0156	KY DIVISION OF FORESTRY – FORESTRY RESE	USDA
KY 990312 – 0157	WHITLEY COUNTY 21ST CENTURY COMMUNITY	EDUC
KY 990312 – 0158	KSU COMPREHENSIVE SCIENCE INTRANET PR	EDUC
KY 990312 – 0159	PROJECT PETT	DOI
KY 990312 – 0160	WILLOW GREEN COMPANY EXPANSION	CDBG
KY 990312 – 0161	THE CENTER FOR RURAL DEVELOPMENT TELE	DOC
KY 990312 – 0162	RIVER CITIES DISPOSAL, LLC BUSINESS & IND	RECD
KY 990312 – 0163	DEMOCRACY RESOURCE CENTER, INC. ENVIR	EPA
KY 990312 – 0164	CITY OF CORBIN KIA PROJECT	EPA
KY 990316 – 0165	BRECKINRIDGE COUNTY BOARD OF EDUCATIO	HHS
KY 990316 – 0166	KY DIVISION OF WATER’S SECTION 104(B)(3) W	EPA
KY 990316 – 0167	CITY OF WHITESBURG PEAR PROJECT	EPA
KY 990316 – 0168	U OF L ENVIRONMENTAL JUSTICE SMALL GRA	EPA
KY 990316 – 0169	CITY OF HIGHLAND HEIGHTS COPS AHEAD AN	DOJ
KY 990317 – 0170	BLUEGRASS COMMUNITY ACTION AGENCY HE	HHS
KY 990317 – 0171	THE LOST SQUADRON MUSEUM, INC. TELECO	DOC
KY 990317 – 0172	PARK DUVALLE COMMUNITY HEALTH CENTER,	HHS
KY 990317 – 0173	LKLP COMMUNITY ACTION COMMUNITY FOOD	HHS
KY 990317 – 0174	KENTUCKY DEPARTMENT FOR THE BLIND KY I	EDU
KY 990317 – 0175	CLARK COUNTY HAZARD MITIGATION PROJEC	FEMA
KY 990317 – 0176	BRACKEN COUNTY HAZARD MITIGATION	FEMA
KY 990317 – 0177	BOONE COUNTY HAZARD MITIGATION	FEMA
KY 990317 – 0178	CITY OF DANVILLE HAZARD MITIGATION	FEMA
KY 990322 – 0179	BULLITT COUNTY SHERIFF’S DEPARTMENT CO	DOJ
KY 990322 – 0180	U OF KY EMSC TARGETED ISSUES GRANT	HHS
KY 990322 – 0181	SHEPHERDSVILLE POLICE DEPARTMENT COP	DOJ
KY 990322 – 0182	AUDUBON AREA COMMUNITY SERVICES, INC.	HHS
KY 990322 – 0183	SOUTHEAST KENTUCKY PRIMARY CARE COAL	HHS
KY 990322 – 0184	ALBANY WASTEWATER TREATMENT PLANT R	RECD
KY 990322 – 0185	SIEMENS INDUSTRIAL BUILDING ACQUISITION	CDBG
KY 990322 – 0186	UK PAR-99-032 EXTRAMURAL RESEARCH FACI	HHS

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KY 990325 – 0187	KENTUCKY MOUNTAIN HOUSING PRESERVATI	USDA
KY 990325 – 0188	STAR SCHOOL PROGRAM	EDUC
KY 990325 – 0189	PENDLETON COUNTY SPECULATIVE BUILDING	EDA
KY 990325 – 0190	CENTRAL KENTUCKY CLEAN CITIES SUPPORT	ENERGY
KY 990325 – 0191	FEDERAL ENERGY MANAGEMENT PROGRAM	ENERGY
KY 990325 – 0192	REBUILD AMERICA PROJECT	ENERGY
KY 990325 – 0193	CNG REFUELING AT ROHM AND HASS CO.	ENERGY
KY 990325 – 0194	KENTUCKY ALUMINUM TECHNOLOGY ROADM	ENERGY
KY 990325 – 0195	LEVERAGING EDUCATIONAL ASSISTANCE PAR	EDUC
KY 990325 – 0196	LINCOLN COUNTY – HUSTONVILLE ELEMENTA	HHS
KY 990325 – 0197	KENTUCKY RIVER FOOTHILLS HEAD START	HHS
KY 990325 – 0198	HINDMAN WATER SYSTEM IMPROVEMENTS PR	CDBG
KY 990325 – 0199	LAUREL COUNTY HEAD START	HHS
KY 990325 – 0200	EZEL/LIBERTY ROAD SEWER SERVICE	EPA
KY 990329 – 0201	ASHLAND ALLIANCE ARC PROJECT	ARC
KY 990329 – 0202	TRIMBLE COUNTY HEAD START/COLA/QUALIT	HHS
KY 990329 – 0203	TRIMBLE COUNTY HEAD START PROGRAM 199	HHS
KY 990329 – 0204	GATEWAY ADD TECHNOLOGY UPDATE ARC P	ARC
KY 990329 – 0205	KENTUCKY DEPARTMENT FOR THE BLIND STATE PLAN	EDUC
KY 990329 – 0206	CAMPBELL COUNTY VICTIM ADVOCATE PROG	DOJ
KY 990329 – 0207	CENTERTOWN SEWER REPLACEMENT	RECD
KY 990329 – 0208	PENNYRILE ADD AGING PROGRAM	HHS
KY 990329 – 0209	WKU UNDERGRADUATE INTERNATIONAL STUD	EDUC
KY 990329 – 0210	CITY OF BLOOMFIELD, NELSON COUNTY COPS	DOJ
KY 990329 – 0211	KENTUCKY RIVER FOOTHILLS NUTRITION EDU	HHS
KY 990329 – 0212	OHIO VALLEY EDUCATIONAL COOPERATIVE H	HHS
KY 990329 – 0213	CITY OF JACKSON DISTRIBUTION IMPROVEME	USDA, RD, ARC
KY 990329 – 0214	MIDDLESBORO 21ST CENTURY COMMUNITY LE	EDUC
KY 990330 – 0215	EKU KENTUCKY ARTISAN HERITAGE TRAILS	ARC
KY 990330 – 0216	OLDHAM COUNTY CENTER BASED HEAD STAR	HHS
KY 990330 – 0217	COMMUNITY ACTION COUNCIL SHARE FOOD C	HHS
KY 990330 – 0218	CUMBERLAND COUNTY SOLID WASTE REVOLV	KIA
KY 990330 – 0219	DARE TO CARE, INC. FOOD BANK WAREHOUS	HHS
KY 990401 – 0220	BETHANY HOUSE AND BAPTIST CARE HOMES	HUD
KY 990401 – 0221	GREEN RIVER ADD ECONOMIC DEVELOPMENT	EDA
KY 990401 – 0222	CITY OF GLASGOW COMMUNITY ORIENTED PO	DOJ
KY 990401 – 0223	RESIDENTIAL SUBSTANCE ABUSE TREATMEN	DOJ
KY 990401 – 0224	MAYSVILLE-MASON COUNTY RECREATIONAL	FHA
KY 990401 – 0225	LKLP VICTIMS OF CRIME ASSISTANCE PROGR	DOJ
KY 990401 – 0226	OWSLEY COUNTY COPS UNIVERSAL HIRING P	DOJ
KY 990405 – 0227	SOUTHEAST KENTUCKY WOOD PRODUCTS &	ARC
KY 990405 – 0228	SMOKETOWN/SHELBY PARK WEED AND SEED	DOJ
KY KY990 – 0229	DUPLICATE OF KY99-0226	
KY 990405 – 0230	CITY OF MILTON WATER DISTRIBUTION SYSTE	USDA, RECD

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KY 990405 – 0231	HAZARD PERRY COUNTY COMMUNITY MINISTR	HHS
KY 990405 – 0232	COMMUNITY OUT REACH CONTINUATION OF E	HUD
KY 990405 – 0233	BIG SANDY ADD ECONOMIC OPPORTUNITY PR	EDA
KY 990405 – 0234	BIG SANDY ADD ECONOMIC OPPORTUNITY PL	EDA
KY 990405 – 0235	LICKING VALLEY C.A.P., INC. HEAD START FUL	HHS
KY 990405 – 0236	BELL COUNTY & HARLAN COUNTY ECONOMIC	EDA
KY 990405 – 0237	KENTUCKY INTENSIVE SERVICES PROJECT	DOJ
KY 990405 – 0238	CITY OF PIKEVILLE EMERGENCY SHELTER	HUD
KY 990405 – 0239	WARREN COUNTY HAZARD MITIGATION	FEMA
KY 990408 – 0240	CITY OF MORTONS GAP CITY PARK WALKING	FHA
KY 990408 – 0241	WKU IMPROVING TEACHER QUALITY THROUG	EDUC
KY 990408 – 0242	MOREHEAD RANGER DISTRICT OF THE DANIEL	FHA
KY 990408 – 0243	CITY OF ELKTON WALKING TRAIL	FHA
KY 990408 – 0244	CADIZ RAILROAD WALKING/BICYCLE TRAIL PH	FHA
KY 990408 – 0245	GRANT COUNTY FITNESS TRAIL PROJECT	FHA
KY 990408 – 0246	LOST PARADISE TRAIL – RAIL TO TRAIL PROJE	FHA
KY 990408 – 0247	MSU PARTNERSHIP TO ENHANCE TEACHER Q	EDUC
KY 990408 – 0248	LAKEVIEW PARK RECREATIONAL TRAIL	FHA
KY 990408 – 0249	PROJECT HOPE II	DOJ
KY 990408 – 0250	KENTUCKY EMERGENCY IMMIGRANT EDUCATI	EDUC
KY 990408 – 0251	BOWLING GREEN POLICE DEPARTMENT VICTI	DOJ
KY 990408 – 0252	SMITHLAND HISTORICAL TRAIL	FHA
KY 990408 – 0253	CAMP WILDCAT CIVIL WAR SITE -INTERPRETI	DOT
KY 990408 – 0254	KY RIVER ADD ECONOMIC DEVELOPMENT STR	EDA
KY 990408 – 0255	BEATTYVILLE WATER DISTRIBUTION SYSTEM	EDA
KY 990408 – 0256	LAKE CUMBERLAND HEAD START PROJECT	HHS
KY 990408 – 0257	GATEWAY COMMUNITY SERVICES ORGANIZAT	HHS
KY 990408 – 0258	EKU PARTNERSHIP FOR IMPROVING TEACHER	EDUC
KY 990408 – 0259	WOODFORD COUNTY COMMUNITY LEARNING	EDUC
KY 990408 – 0260	MONTGOMERY COUNTY SCHOOL RESOURCE	DOJ
KY 990408 – 0261	KCEOC WOMEN'S EMERGENCY SUPPORT CEN	HUD
KY 990408 – 0262	99-CHS-002 KENTUCKY STATEWIDE PLAN FOR	HHS
KY 990409 – 0263	WILMORE FARM PARK	FHA
KY 990409 – 0264	KNIGHT'S BRIDGE LANDING TRAILHEAD	FHWA
KY 990409 – 0265	PULASKI COUNTY PARK RECREATIONAL TRAI	FHA
KY 990409 – 0266	CITY OF ASHLAND HOMELESS SHELTER PROJ	HUD
KY 990409 – 0267	DEVOU PARK NATURE TRAILS	FHA
KY 990409 – 0268	HIGHSPLINT RECREATIONAL AREA	FHA
KY 990409 – 0269	TRIMBLE COUNTY TRAILS PROJECT	FHA
KY 990409 – 0270	BOWLING GREEN-WARREN CO.-THE SALVATI	HUD
KY 990409 – 0271	MCCTHB,INC. TRANSITIONAL HOUSING	HUD
KY 990409 – 0272	BIG SANDY AREA COMMUNITY ACTION PROGR	HUD
KY 990413 – 0273	CLINTON COUNTY FAD PROJECT	DOJ
KY 990413 – 0274	THE LINCOLN TRAIL DOMESTIC VIOLENE PR	HUD
KY 990413 – 0275	GEORGETOWN/SCOTT COUNTY HAZARD MITIG	FEMA
KY 990413 – 0276	GRAVES COUNTY HAZARD MITIGATION	FEMA
KY 990413 – 0277	MASTERTON STATION GREENWAY PHASE I TR	FHA

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KY 990413 – 0278	CAMP NELSON HERITAGE TRAIL	FHA
KY 990413 – 0279	BIG SANDY ADD WORKFORCE 2001 PROJECT	ARC
KY 990413 – 0280	BIG SANDY ADD WORKFORCE 2001 PROJECT	ARC
KY 990413 – 0281	WARREN COUNTY RIVERFRONT DEVELOPMEN	FHA
KY 990413 – 0282	BRUSHY FORK TRAIL DEVELOPMENT PROJE	DOT
KY 990413 – 0283	CITY OF JACKSON SEWER EXTENSION	EDA
KY 990413 – 0284	LAKE VILLAGE WATER ASSOCIATION PROJE	RD
KY 990413 – 0285	MONTJOY CREEK TRAIL PROJECT	DOT
KY 990413 – 0286	BUFFALO TRACE/GATEWAY REGIONAL NARC	DOJ
KY 990413 – 0287	LOTT'S CREEK MEMORIAL TRAIL	DOT
KY 990413 – 0288	LEBANON COMMUNITY TRAIL	DOT
KY 990413 – 0289	NEWMAN PARK RECREATIONAL COMPLEX TR	DOT
KY 990413 – 0290	CITY OF FRANKLIN WALKING TRAIL PROJECT	FHA
KY 990413 – 0291	MARROWBONE COMMUNITY PARK	DOT
KY 990413 – 0292	ALLEN COUNTY WATER DISTRICT ADMINISTRA	RD
KY 990415 – 0293	LINCOLN COUNTY HEAD START	HHS
KY 990415 – 0294	LEXINGTON-FAYETTE HEALTH DEPAR	HHS
KY 990415 – 0295	CITY OF LOUISVILLE G.R.E.A.T. PROJECT	DOJ
KY 990415 – 0296	CITY OF LOUISVILLE OPERATION SAFE CITY	DOJ
KY 990415 – 0297	LOUISVILLE DIVISION OF POLICE PREVENTING	DOJ
KY 990415 – 0298	LOUISVILLE JUVENILE DRUG COURT	DOJ
KY 990415 – 0299	RECREATION OF WHITESVILLE COMMUNITY P	FHA
KY 990415 – 0300	CONNECTION BRIDGE AT PANTHER CREEK PA	FHA
KY 990415 – 0301	NORTH OHIO COUNTY PARK TRIAL	FHA
KY 990415 – 0302	SEBREE SPRINGS	FHA
KY 990415 – 0303	ATTORNEY'S OFFICE INTENSIVE CHILD SEXUA	DOJ
KY 990415 – 0304	JESUS COMMUNITY CENTER SHELTER FOR TH	HUD
KY 990415 – 0305	GREATER HARDIN COUNTY REGIONAL DRUG E	DOJ
KY 990415 – 0306	THE CARING PLACE, INC. SHELTER PROGRAM	HUD
KY 990415 – 0307	DEWITT COMMUNITY TRAIL PROJECT	DOT
KY 990415 – 0308	FORD'S WOODS TRAIL PROJECT	DOT
KY 990415 – 0309	HOPKINSVILLE HOMELESS, INC.	HUD
KY 990415 – 0310	JOINT FEDERAL/STATE MOTOR FUELS TAX CO	FHA
KY 990415 – 0311	NEXT GENERATION ENTREPRENEURIAL SCHO	ARC
KY 990416 – 0312	HAZARD PERRY CO.COMMUNITY MINISTRIES,	HHS
KY 990416 – 0313	LINCOLN COUNTY BOARD OF EDUCATION EAR	HHS
KY 990416 – 0314	MOUNTAIN OUTREACH, INC. TRANSITIONAL H	HUD
KY 990416 – 0315	PRIDE	EDA
KY 990416 – 0316	PROTECTION AND ADVOCACY GRANT PROJE	EDUC
KY 990416 – 0317	99CFC-002 WELFARE TO WORK PROGRAM	USDOL
KY 990416 – 0318	CITY OF INDEPENDENCE D.A.R.E.	DOJ
KY 990416 – 0319	GATEWAY HOUSE - GATEWAY HOMELESS CO	HUD
KY 990416 – 0320	WHITELY COUNTY #7 NS EMERGENCY SHELTE	HUD
KY 990416 – 0321	PENNRILE ADD EDA SSED PLANNING STRATE	EDA
KY 990416 – 0322	DROEGE HOUSE AND THE "ALL ABOUT WORK"	HUD
KY 990416 – 0323	FRANKLIN COUNTY CRIME COMMISSION	DOJ
KY 990416 – 0324	SIMON HOUSE OPERATIONS PROJECT	HUD

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KY 990416 – 0325	O.A.S.I.S./BOULWARE CENTER/DANIEL PITINO	HUD
KY 990416 – 0326	ELEVENTH JUDICIAL CIRCUIT VICTIM ASSISTA	DOJ
KY 990416 – 0327	SOMERSET POLICE DEPARTMENT MULTI-JURI	DOJ
KY 990416 – 0328	LEWIS COUNTY HOMELESS PROGRAM	HUD
KY 990416 – 0329	H.O.S.T. YOUTH SHELTER FOUNDATION, INC. E	HUD
KY 990416 – 0330	CASEY COUNTY HAZARD MITIGATION	FEMA
KY 990419 – 0331	WESTERN KY RECREATION ASSOCIATION, INC.	FHA
KY 990419 – 0332	BUTCHERTOWN GREENWAY EXPANSION	FHA
KY 990419 – 0333	HENDERSON POLICE DEPARTMENT COPS UNI	DOJ
KY 990419 – 0334	KIDS PROJECT	DOJ
KY 990419 – 0335	KENTUCKY BAPTIST HOMES FOR CHILDREN E	HUD
KY 990419 – 0336	OPERATION CARE, INC. EMERGENCY SHELTER	HUD
KY 990419 – 0337	DOVES VICTIM ADVOCATE/COUNSELOR	DOJ
KY 990419 – 0338	HART COUNTY VICTIM ADVOCATE	DOJ
KY 990419 – 0339	PADUCAH COOPERATIVE MINISTRY& WOMEN	HUD
KY 990419 – 0340	CENTER FOR WOMEN IN CRISIS/ROSEHAVEN P	HUD
KY 990419 – 0341	GOOD NEWS HOMES	HUD
KY 990419 – 0342	GOD'S HOME FOR FAMILIES, INC. "MATHEW'S	HUD
KY 990419 – 0343	THE SALVATION ARMY HOMELESS/EMERGENC	HUD
KY 990419 – 0344	PENTICAL	EDUC
KY 990419 – 0345	HPCCM TRANSITIONAL HOUSING AND FAMILY	HUD
KY 990419 – 0346	RICHMOND HOMELESS SERVICE GRANT	HUD
KY 990419 – 0347	SHECHEM	HUD
KY 990419 – 0348	CENTRAL KY COMMUNITY ACTION COUNCIL H	HUD
KY 990419 – 0349	DAPCO, INC.	AGRIC
KY 990421 – 0350	THE CENTER FOR WOMEN AND FAMILIES COM	HHS
KY 990421 – 0351	THE HENDERSON CO. CHILDREN'S ADVOCACY	DOJ
KY 990421 – 0352	WARREN COUNTY CRIME VICTIM ASSISTANCE	DOJ
KY 990421 – 0353	CUMBERLAND RIVER MENTAL HEALTH VICTIM	DOJ
KY 990421 – 0354	THE CENTER FOR WOMEN AND FAMILIES RAP	DOJ
KY 990421 – 0355	THE CENTER FOR WOMEN AND FAMILIES DOM	DOJ
KY 990421 – 0356	ECHO VOLUNTEER COORDINATION	DOJ
KY 990421 – 0357	THE CRISIS INTERVENTION VOCA PROJECT	DOJ
KY 990421 – 0358	29 TH JUDICIAL CIRCUIT VICTIM'S ADVOCACY P	DOJ
KY 990421 – 0359	WESTERN MASON WATER DISTRICT WATER S	RD
KY 990421 – 0360	TEACHER QUALITY ENHANCEMENT GRANT	EDUC
KY 990421 – 0361	GOD'S HELPING HAND EMERGENCY SHELTER	HUD
KY 990421 – 0362	COMMUNICARE TRANSITIONAL HOUSING PRO	HUD
KY 990421 – 0363	JESSAMINE COUNTY VICTIM'S ADVOCACY PRO	DOJ
KY 990421 – 0364	BARREN RIVER AREA SAFE SPACE, INC. SPOU	HUD
KY 990421 – 0365	CITY OF WINCHESTER HAZARD MITIGATION	FEMA
KY 990421 – 0366	MARSHALL COUNTY HAZARD MITIGATION	FEMA
KY 990423 – 0367	WOMEN AWARE, INC. DOMESTIC VIOLENCE OU	DOJ
KY 990423 – 0368	VICTIMS ADVOCATE FOR BOYLE AND MERCER	DOJ
KY 990423 – 0369	GUS ADVOCACY CENTER FOR ABUSED CHILD	DOJ
KY 990423 – 0370	BLUEGRASS REGIONAL MH/MR BOARD, INC. C	DOJ
KY 990423 – 0371	RAPE VICTIM SERVICES PROJECT	DOJ

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KY 990423 – 0372	CRIME IMPACT REDUCTION FOR CHILDREN AN	DOJ
KY 990423 – 0373	MADD KY STATEWIDE VICTIMS ASSISTANCE P	DOJ
KY 990423 – 0374	BLUEGRASS REGIONAL MH/MR BOARD CHILD	DOJ
KY 990423 – 0375	TAYLOR COUNTY ATTORNEY'S VICTIM ASSIST	DOJ
KY 990423 – 0376	CHILDREN FIRST VICTIM CRISIS RESPONSE PR	DOJ
KY 990423 – 0377	JOHNSON COUNTY VAP PROJECT	DOJ
KY 990423 – 0378	HARDIN COUNTY CASA PROGRAM, INC. VICTIM	DOJ
KY 990423 – 0379	SEXUALLY TRANSMITTED DISEASE CONTROL	HHS
KY 990423 – 0380	SOMERSET POLICE DEPARTMENT CRIME VICTI	DOJ
KY 990423 – 0381	YWCA OF LEXINGTON SPOUSE ABUSE CENTE	DOJ
KY 990423 – 0382	FAMILY & CHILDREN'S COUNSELING CENTERS	DOJ
KY 990423 – 0383	KENTUCKY FARMWORKER PROGRAMS, INC. J	DOL
KY 990423 – 0384	FLEGLES, INC. TRUE VALUE HARDWARE STOR	RD
KY 990426 – 0385	BLUE GRASS COMMUNITY ACTION AGENCY VI	DOJ
KY 990426 – 0386	LAKE CUMBERLAND COMMUNITY SERVICES H	HHS
KY 990426 – 0387	UK STATE OFFICE OF RURAL HEALTH	HHS
KY 990426 – 0388	WHITLEY COUNTY SCHOOL CAMPUS CLINIC	HHS
KY 990426 – 0389	THE SUNSHINE CENTER THERAPY PROGRAM	DOJ
KY 990426 – 0390	THE STATE OF KENTUCKY'S PATH FORMULA G	HHS
KY 990426 – 0391	MCCREARY COUNTY SPECULATIVE BUILDING	AGRIC,RD
KY 990426 – 0392	BARREN COUNTY VICTIM ADVOCATE	DOJ
KY 990426 – 0393	METCALFE COUNTY VICTIM ADVOCATE PROJE	DOJ
KY 990426 – 0394	ROCKCASTLE AND LINCOLN COUNTY VICTIM A	DOJ
KY 990426 – 0395	COMMUNICARE, INC. RAPE VICTIM SERVICES	DOJ
KY 990426 – 0396	BOURBON COUNTY HEAD START PROGRAM	HHS
KY 990426 – 0397	FAYETTE COUNTY CRIME VICTIM ASSISTANCE	DOJ
KY 990426 – 0398	UNION COUNTY WORKFORCE DEVELOPMENT	EDA
KY 990426 – 0399	PENDLETON FITNESS TRAIL	DOT
KY 990426 – 0400	THE RAPE CRISIS AND PREVENTION CENTER R	DOJ
KY 990426 – 0401	BRIGHTON CENTER, INC. HOMEWARD BOUND	DOJ
KY 990426 – 0402	BARREN RIVER AREA CHILD ADVOCACY CENT	DOJ
KY 990426 – 0403	U OF L C.A.R.D.S.	DOJ
KY 990426 – 0404	THE LINCOLN TRAIL DOMESTIC VIOLENCE PR	DOJ
KY 990426 – 0405	THE HOME OF THE INNOCENTS, INC. CHILD VIC	DOJ
KY 990426 – 0406	WOMEN'S CRISIS CENTER, INC. VICTIM ASSIST	DOJ
KY 990426 – 0407	MAYFIELD-GRAVES COUNTY CHILD ADVOCAC	DOJ
KY 990426 – 0408	LAUREL COUNTY VICTIM ADVOCATE	DOJ
KY 990426 – 0409	CAMPBELL COUNTY VICTIM ASSISTANCE PRO	DOJ
KY 990426 – 0410	CUMBERLAND VALLEY CHILDREN'S ADVOCAC	DOJ
KY 990426 – 0411	THE FAMILY VIOLENCE INTERVENTION PROJEC	DOJ
KY 990426 – 0412	FRANKLIN COUNTY CRIME VICTIMS ASSISTAN	DOJ
KY 990426 – 0413	GRAVES COUNTY ATTORNEY'S OFFICE CRIME	DOJ
KY 990426 – 0414	JACKSON PURCHASE AREA DRUG TASK FORC	DOJ
KY 990426 – 0415	BOWLING GREEN – WARREN COUNTY DRUG T	DOJ
KY 990426 – 0416	KENTON COUNTY VICTIM ASSISTANCE PROJE	DOJ
KY 990426 – 0417	FORESTRY INCENTIVES PROGRAM (FIP)	USDA
KY 990426 – 0418	STATE CRIMINAL ALIEN ASSISTANCE PROGRA	DOJ

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KY 990426 – 0419	PADUCAH-MCCRACKEN COUNTY CHILD WATC	DOJ
KY 990429 – 0420	LEXINGTON-FAYETTE URBAN COUNTY GOVER	HUD
KY 990429 – 0421	CARROLL COUNTY BOARD OF EDUCATION HE	HHS
KY 990429 – 0422	CARROLL COUNTY HEAD START PROGRAM-P	HHS
KY 990429 – 0423	KY EDIS PLAN STATE AND LOCAL PARTNERSH	ARC
KY 990429 – 0424	ELDERSERVE'S ELDERLY VICTIMS ASSISTANC	DOJ
KY 990429 – 0425	SOMERSET POLICE DEPARTMENT D.A.R.E.	DOJ
KY 990429 – 0426	SOMERSET POLICE DEPARTMENT G.R.E.A.T.	DOJ
KY 990429 – 0427	JEFFERSON COUNTY BOARD OF EDUCATION E	HHS
KY 990429 – 0428	KINGDOM COME INDUSTRIAL DEVELOPMENT	AGRIC
KY 990429 – 0429	KTC99-006 PLANNING AND RESEARCH PROGRAM	FHA
KY 990429 – 0430	R&D DEVELOPERS, INC. BUSINESS & INDUSTR	RDA
KY 990429 – 0431	BARREN RIVER AREA SAFE SAPCE, INC. VICTI	DOJ
KY 990429 – 0432	TRANSITIONS INCORPORATED NCAP PROJEC	DOJ
KY 990429 – 0433	THE CHILDREN'S ADVOCACY CENTER VICTIMS	DOJ
KY 990429 – 0434	THE NORTHERN KENTUCKY CHILDREN'S ADVO	DOJ
KY 990429 – 0435	MARYHURST, INC. VOCA PROJECT	DOJ
KY 990429 – 0436	POWELL COUNTY HAZARD MITIGATION	FEMA
KY 990429 – 0437	BARREN COUNTY HAZARD MITIGATION	FEMA
KY 990429 – 0438	OASIS VOCA PROJECT	DOJ
KY 990429 – 0439	JUVENILE OFFENDER PREVENTION AND TREA	DOJ
KY 990429 – 0440	THE CENTER FOR WOMEN AND FAMILIES PUB	HHS
KY 990429 – 0441	LEXINGTON-FAYETTE URBAN COUNTY GOVER	HUD
KY 990503 – 0442	CHILDREN, INC. REACH TO ALL AND REACH T	EDUC
KY 990503 – 0443	KENTUCKY RIVER FOOTHILLS DEVELOPMENT	HHS
KY 990503 – 0444	LUDLOW COPS SCHOOL PARTNERSHIP 1999	DOJ
KY 990503 – 0445	POWELL COUNTY COPS IN SCHOOL PROJECT	DOJ
KY 990503 – 0446	BOURBAN COUNTY SHERIFF DEPARTMENT CO	DOJ
KY 990503 – 0447	JCPS GEAR UP	EDUC
KY 990503 – 0448	WOMEN'S CRISIS CENTER/HOUSING AUTHORIT	HUD
KY 990503 – 0449	EKU GEAR UP PROJECT	EDUC
KY 990503 – 0450	JACKSON POLICE DEPARTMENT COPS IN SCH	DOJ
KY 990503 – 0451	BOWLING GREEN INDEPENDENT TRACKS TO C	EDUC
KY 990503 – 0452	FORWARD IN THE FIFTH PARENTAL ASSISTAN	EDUC
KY 990503 – 0453	MCCRACKEN COUNTY CRIME VICTIMS ADVOC	DOJ
KY 990503 – 0454	KENTUCKY'S EIGHTEENTH SIMPLIFIED GRANT	DOI
KY 990503 – 0455	CLINTON COUNTY KENTUCKY RURAL EZ GEAR	EDUC
KY 990503 – 0456	COMMUNITY ACTION COUNCIL HEAD START C	HHS
KY 990503 – 0457	SYCAMORE HILLS APARTMENTS	HUD, RDA
KY 990503 – 0458	PULASKI COUNTY GEAR UP PROJECT	EDUC
KY 990503 – 0459	PARAGON OF MADISONVILLE	HUD
KY 990503 – 0460	LEXINGTON-FAYETTE URBAN CO. GOV. JUVEN	DOJ
KY 990503 – 0461	KENTON COUNTY JUVENILE JUSTICE PROJEC	DOJ
KY 990503 – 0462	CINCINNATI/NORTHERN KENTUCKY INTERNATI	FAA
KY 990503 – 0463	HOPE'S PLACE, INC. VICTIMS ASSISTANCE PR	DOJ
KY 990503 – 0464	CITY OF LOUISVILLE JUVENILE INTENSIVE SUP	DOJ
KY 990503 – 0465	PUBLIC HOUSING AND JUVENILE CRIME ENFO	DOJ
KY 990503 – 0466	ROWAN COUNTY COMMUNITY WATCH PROGR	DOJ

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KY 990503 – 0467	BREAKING THE BARRIERS TO SUCCESS PROJ	EDUC
KY 990510 – 0468	MOUNTAIN COMPREHENSIVE HEALTH CORPO	HHS
KY 990510 – 0469	NORTH HOPKINS WATER DISTRICT WATER SY	RD
KY 990510 – 0470	MSU CHILD CARE ACCESS MEAN PARENTS I	EDUC
KY 990510 – 0471	BALLARD COUNTY STATE CRIMINAL ALIEN AS	DOJ
KY 990510 – 0472	CITY OF EVARTS WASTE WATER SYSTEM REH	RD
KY 990510 – 0473	NORTHEAST KENTUCKY AREA DEVELOPMENT	HHS
KY 990510 – 0474	KENTUCKY HEARTLAND CIVIL WAR TRAIL MAR	MA
KY 990510 – 0475	KIPDA FY2000 TRANSPORTATION PLANNING W	FHA
KY 990510 – 0476	TBI – WILLOW POND FARM 2 (NEW)	HUD
KY 990510 – 0477	TBI – WILLOW POND FARM 1 (EXISTING)	HUD
KY 990510 – 0478	URBAN WILDLIFE HABITAT GARDEN “LOOK W	EPA
KY 990510 – 0479	MUHLENBERG COMMUNITY HOSPITAL BLACK	HHS
KY 990510 – 0480	JEFFERSON COMMUNITY COLLEGE DISABILIT	EDUC
KY 990510 – 0481	EMORY UNIVERSITY REGIONAL TRAINING CEN	HHS
KY 990510 – 0482	LICKING VALLEY COMMUNITY ACTION PROGR	EDUC
KY 990510 – 0483	FULTON COUNTY GEAR UP AND SOAR PROJE	EDUC
KY 990510 – 0484	KENTUCKY FARMWORKER PROGRAM, INC. FA	LABOR
KY 990510 – 0485	ALEXANDRIA SEWER SYSTEM	CDBG
KY 990510 – 0486	HARDIN COUNTY HAZARD MITIGATION	FEMA
KY 990510 – 0487	NEW LIBERTY NEIGHBORHOOD REVITALIZATI	CDBG
KY 990510 – 0488	DAVIESS COUNTY CRIME VICTIM ASSISTANCE	DOJ
KY 990510 – 0489	JEFFERSON COUNTY STREET SALES ENFORC	DOJ
KY 990510 – 0490	CADAVER DOG	DOJ
KY 990510 – 0491	KENTUCKY SERVICES FOR CHILDREN AND YOUN	EDUC
KY 990510 – 0492	CARL PERKINS VOCATIONAL TECHNICAL EDU	EDUC
KY 990510 – 0493	SPENCER COUNTY ARMED FORCES MEMORIA	MA
KY 990510 – 0494	GATEWAY CSE MANAGEMENT SYSTEM FOR P	DOJ
KY 990510 – 0495	KENTUCKY REFUGEE PREVENTIVE HEALTH PR	HHS
KY 990512 – 0496	BLUE GRASS COMMUNITY ACTION AGENCY H	HHS
KY 990512 – 0497	SCOTT-FAYETTE AIRPORT BOARD AIRPORT IM	FAA
KY 990512 – 0498	MORTONS GAP WATER SYSTEM IMPROVEMEN	RDA
KY 990512 – 0499	PIKEVILLE COLLEGE LEEP PROJECT	EDUC
KY 990512 – 0500	NORTHERN KENTUCKY DRUG STRIKE FORCE	DOJ
KY 990512 – 0501	HENDERSON COUNTY-CITY AIRPORT IMPROVE	FAA
KY 990512 – 0502	BOYD COUNTY HEAD START EXPANSION	HHS
KY 990512 – 0503	KENTUCKY READING EXCELLENCE PROJECT	EDUC
KY 990512 – 0504	THE HOUSING FOUNDATION EAST AND WEST	HUD
KY 990512 – 0505	TRI COUNTY AREA DRUG TASK FORCE	DOJ
KY 990512 – 0506	KPDES NO. KY0086622 CITY OF MOUNT OLIVET	EPA
KY 990512 – 0507	SHIVELY ENHANCED POLICING PROJECT	DOJ
KY 990512 – 0508	NORTH LOGAN WATER DISTRICT NO. 1 WATER	USDA, RD
KY 990512 – 0509	NORTH SHELBY WATER COMPANY WATER SY	RD
KY 990512 – 0510	PIKEVILLE 2000	DOT
KY 990517 – 0511	PRE CIVIL WAR CEMETARY PRESERVATION PR	MA
KY 990517 – 0512	MUHLENBERG COUNTY STATE AND LOCAL NARC	DOJ

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KY 990517 – 0513	FLEMING COUNTY STRIVING TO EDUCATE AND	DOJ
KY 990517 – 0514	FLEMING COUNTY “POSTE” PROJECT	DOJ
KY 990517 – 0515	CLEAR CREEK GREENWAY PROJECT	DOT
KY 990517 – 0516	MERCY MANOR APARTMENTS	HUD
KY 990517 – 0517	CITY OF ERLANGER KY CRIME PREVENTION C	DOJ
KY 990517 – 0518	RADCLIFF- FORT KNOX ROTC ENHANCEMENT	MA
KY 990517 – 0519	BENHAM COAL MINER’S MEMORIAL THEATER	MA
KY 990517 – 0520	FLEMING COUNTY VETERN’S MEMORIAL	MA
KY 990517 – 0521	GENERAL JAMES TAYLOR MONUMENT HISTOR	MA
KY 990517 – 0522	FAMILY HEALTH CENTERS, INC. FY99 NEW AC	HHS
KY 990517 – 0523	DOD PTA COOPERATIVE AGREEMENT PROGR	DLA
KY 990517 – 0524	KENTUCKY CIVIL WAR HERITAGE DRIVING TRA	MA
KY 990517 – 0525	SITE PREPARATIONS & MODIFICATIONS DEVE	MA
KY 990517 – 0526	MCLEAN COUNTY CIVIL WAR MUSEUM AND LI	MA
KY 990517 – 0527	OWSLEY COUNTY LAW ENFORCEMENT SERVI	DOJ
KY 990517 – 0528	AMERICAN LEGION RUSSELL POST NO. 133 RE	MA
KY 990517 – 0529	SOUTHEASTERN KENTUCKY REHABILITATION	USDA, RDA
KY 990517 – 0530	PADUCAH’S OPERATION SAFE CITIES	DOJ
KY 990517 – 0531	OHIO COUNTY VETERANS MEMORIAL BUILDIN	MA
KY 990517 – 0532	VETERANS PARK IN SCIENCE HILL KENTUCKY	MA
KY 990517 – 0533	PILOT VICTIM INTERVENTION PROGRAM (VIP)	DOJ
KY 990517 – 0534	CITY OF WILMORE VETERAN RAILSIDE HISTOR	MA
KY 990517 – 0535	V.E.R.N.O.C.	DOJ
KY 990517 – 0536	S.A.V.I.P.	DOJ
KY 990517 – 0537	CARROLL COUNTY KENTUCKY VETERANS ME	MA
KY 990517 – 0538	UK RURAL TELEMEDICINE HUB	HHS
KY 990517 – 0539	LEXINGTON-FAYETTE URBAN CO. GOVERNME	DOJ
KY 990517 – 0540	PRISONER OF WAR/MISSING IN ACTION MEMO	MA
KY 990517 – 0541	ELDER ABUSE OFFICER PROJECT	DOJ
KY 990517 – 0542	STREET SALES ENFORCEMENT PROJECT	DOJ
KY 990517 – 0543	CITY OF NEWPORT SCHOOL BASED PARTNER	DOJ
KY 990517 – 0544	BATH COUNTY VETERAN’S CENTER	MA
KY 990517 – 0545	TIC TOC	DOJ
KY 990517 – 0546	2010 PARTNERING STUDY PROJECT	MA
KY 990517 – 0547	BRECKINRIDGE COUNTY HEAD START SUPPLE	HHS
KY 990517 – 0548	BUECHEL TRAIN STATION	FHA
KY 990517 – 0549	JEFFERSON COUNTY JUVENILE ACCOUNTABIL	DOJ
KY 990517 – 0550	FY2000 ANNUAL ELEMENT OF LOUISVILLE UR	FHA
KY 990519 – 0551	KENTUCKY RIVER FOOTHILLS HEAD START EX	HHS
KY 990519 – 0552	BAKER APARTMENTS	HUD
KY 990519 – 0553	FANCY FARM ELDERLY APARTMENTS	HUD
KY 990519 – 0554	WINGO ELDERLY APARTMENTS	HUD
KY 990519 – 0555	DPA CASE TRACKING SYSTEM INTEGRATION A	DOJ
KY 990519 – 0556	DPA TELEPHONE COMMUNICATIONS SYSTEMS	DOJ
KY 990519 – 0557	DPA DOCUMENT MANAGEMENT TECHNOLOGY	DOJ
KY 990519 – 0558	DPA TECHNOLOGY REPLACEMENT CYCLE PR	DOJ

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KY 990519 – 0559	FIELD OFFICE ENHANCED COMMUNICATION /C	DOJ
KY 990519 – 0560	U OF L REGION IV ENVIRONMENTAL CENTER	EPA
KY 990519 – 0561	KENTUCKY'S FFY99 SECTION 319(H) NONPOIN	66.459
KY 990519 – 0562	MOUNTAIN COMPREHENSIVE HEALTH CORP. I	HHS
KY 990519 – 0563	LOUISVILLE/JEFFERSON COUNTY HAZARD MIT	FEMA
KY 990519 – 0564	LEXINGTON/FAYETTE COUNTY HAZARD MITIG	FEMA
KY 990519 – 0565	BLUEGRASS CHALLENGE ACADEMY COMPUT	MA
KY 990519 – 0566	NORFOLK INFRASTRUCTURE IMPROVEMENTS	CDBG
KY 990519 – 0567	CAMP NELSON HERITAGE PARK DEVELOPMEN	MA
KY 990519 – 0568	OFFICE OF THE ATTORNEY GENERAL PROSEC	DOJ
KY 990519 – 0569	DANVILLE-BOYLE COUNTY STREETSCAPES FO	DOT
KY 990520 – 0570	PRESCRIPTION DRUG DIVERSION PROJECT	DOJ
KY 990520 – 0571	ATHLETES HELPING YOUTH S.T.A.Y.	DOJ
KY 990520 – 0572	FAMILY WORKSHOP, INC. VICTIM ASSISTANCE	DOJ
KY 990520 – 0573	COMMUNITY VENTURES CORP. HB-SUB-PRIORI	HHS
KY 990520 – 0574	CITY OF PRESTONSBURG OLD POST OFFICE B	MA
KY 990520 – 0575	KENTUCKY SUPPORTED EMPLOYMENT PHASE	HHS
KY 990520 – 0576	HOMEWARD BOUND RUNAWAY SHELTER	HHS
KY 990520 – 0577	HOLIDAY INN EXPRESS MOTEL-CORBIN, KEN	USDA, RDA
KY 990520 – 0578	NEW OPPORTUNITY SCHOOL FOR WOMEN, INC	ARC
KY 990520 – 0579	LIBERTY WASTEWATER COLLECTION SYSTEM	CDBG
KY 990520 – 0580	DUPLICATION OF 99-0575	
KY 990520 – 0581	BLUEGRASS RAPE CRISIS CENTER, INC. VICTI	DOJ
KY 990520 – 0582	KENTUCKY FAMILY SUPPORT PROJECT	HHS
KY 990520 – 0583	WILLIAMSTOWN HEAD START PROGRAM	HHS
KY 990520 – 0584	HARRODSBURG DOWNTOWN DEVELOPMENT P	DOT
KY 990529 – 0585	AUBURN POLICE DEPARTMENT CORPS UNIVER	DOJ
KY 990525 – 0586	L.K.L.P. COMMUNITY ACTION COUNCIL, INC. H	HHS
KY 990525 – 0587	JEFFERSON COUNTY PUBLIC SCHOOLS HEAD	HHS
KY 990525 – 0588	L53901 CITY OF CALHOUN, MCLEAN COUNTY S	EPA
KY 990525 – 0589	MASH-METRO ALTERNATIVE SHELTER HOUS	HHS
KY 990525 – 0590	CITY OF RANENNA PURCHASE OF EQUIPMENT	KIA
KY 990525 – 0591	LOUISVILLEJUVENILE DRUG COURT	DOJ
KY 990525 – 0592	KENTUCKY STATE POLICE FORENSIC LABORA	DOJ
KY 990525 – 0593	1999 FATAL ANALYSIS REPORTING SYSTEM	DOT
KY 990525 – 0594	KENTUCKY STATE POLICE PLANNING AND AD	DOT
KY 990525 – 0595	KENTUCKY STATE POLICE OCCUPANT PROTE	DOT
KY 990525 – 0596	KENTUCKY STATE POLICE OCCUPANT PROTE	DOT
KY 990525 – 0597	KENTUCKY STATE POLICE OCCUPANT PROTE	DOT
KY 990525 – 0598	KENTUCKY STATE POLICE ALCOHOL PI& E	DOT
KY 990525 – 0599	KENTUCKY STATE POLICE ALCOHOL NETWOR	DOT
KY 990525 – 0600	KENTUCKY STATE POLICE STATEWIDE YOUTH	DOT
KY 990525 – 0601	KENTUCKY STATE POLICE STATEWIDE ALCOH	DOT
KY 990525 – 0602	KSP 99-04 MARIJUANA SUPPRESSION	DOJ
KY 990525 – 0603	KSP 99-05 RURAL DRUG SUPPRESSION	DOJ
KY 990525 – 0604	DUPLICATION OF 99-0603	DOJ
KY 990525 – 0605	KSP 99-07 ENHANCED INTELLIGENCE INFORM	DOJ
KY 990525 – 0606	KSP 99-08 BENCH TIME ENHANCEMENT	DOJ

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KY 990525 – 0607	KSP 99-06 FAMILY VIOLENCE PROGRAM	DOJ
KY 990525 – 0608	KSP 99-03 UNIFIED CRIMINAL JUSTICE INFORM	DOJ
KY 990525 – 0609	KSP 99-02 WHITE COLLAR CRIME/CAREER CRI	DOJ
KY 990525 – 0610	MSU PROJECT CAMPS	EDUC
KY 990525 – 0611	FORT CAMPBELL HISTORICAL COMPLEX AND	MA
KY 990525 – 0612	REGIONAL DRUG COURT	DOJ
KY 990525 – 0613	CEDAR LAKE - FERN CREEK	HUD
KY 990525 – 0614	PUBLIC HEALTH PREPAREDNESS & RESPON	HHS
KY 990525 – 0615	CAMP BRECKINRIDGE OFFICER'S CLUB AND M	MA
KY 990525 – 0616	NEW BEGINNING	HUD
KY 990525 – 0617	UK STATE RURAL HOSPITAL FLEXIBILITY PRO	HHS
KY 990527 – 0618	OWENSBORO COMMUNITY COLLEGE STRENG	EDUC
KY 990527 – 0619	KENTUCKY WESLEYAN COLLEGE STRENGTHEN	EDUC
KY 990527 – 0620	KENTUCKY RIVER COMMUNITY CARE'S VICTIM	DOJ
KY 990527 – 0621	KDMM TRAINING AND EDUCATION PROJECT	MM
KY 990527 – 0622	TREES N TRENDS EXPANSION PROJECT	CDBG
KY 990527 – 0623	PIKE COUNTY AIRPORT IMPROVEMENT PROJE	FFA
KY 990527 – 0624	CLUSTER ANALYSIS OF KENTUCKY INDUSTRIE	DOC
KY 990527 – 0625	COMMUNITY ACTION COUNCIL HEAD START E	HHS
KY 990527 – 0626	KENTUCKY ASSISTIVE TECHNOLOGY SERVICE	EDUC
KY 990527 – 0627	KY REGIONAL ONSITE WASTEWATER TRAININ	EPA
KY 990527 – 0628	PADUCAH INDEPENDENT SCHOOLS HEAD STA	HHS
KY 990528 – 0628	AUDUBON AREA COMMUNITY SERVICES, INC.	HHS
KY 990528 – 0629	SANCTUARY, INC. VICTIM ASSISTANCE PROJE	DOJ
KY 990528 – 0630	WKU TURNHOLE SPRING KARST WATERSHED	EPA
KY 990528 – 0631	THE FAMILY PLACE CHILD ABUSE TREATMENT	DOJ
KY 990528 – 0632	FIND - FAMILY INFORMATION NETWORK ON DI	EDUC
KY 990528 – 0633	HARLAN COUNTY SMALL WATER SYSTEM COO	RDA
KY 990528 – 0634	SEVEN COUNTIES SERVICES, INC. SCHOOL AC	HHS
KY 990528 – 0635	TRANSITIONS INCORPORATED DAY REPORTIN	DOJ
KY 990601 – 0636	LAWRENCE COUNTY SAFE SCHOOLS/HEALTH	EDUC
KY 990601 – 0637	WHITESBURG DISTANCE LEARNING LABORAT	HHS
KY 990601 – 0638	PIKE CPOUNTY ADOLESCENT PREVENTION PRO	HHS
KY 990601 – 0639	PROJECT SHIELD	EDUC
KY 990601 – 0640	99-CFC-003 KY COMMUNITY BASED FAMILY RE	HHS
KY 990601 – 0641	AUDUBON AREA COMMUNITY SERVUCES HEAD	HHS
KY 990601 – 0642	BELL COUNTY MIDDLE SCHOOL DRUG PREVE	EDUC
KY 990601 – 0643	CITY OF COVINGTON JUVENILE OFFENDER IDE	DOJ
KY 990601 – 0644	99-CHS-006 FACE CONTINUATION	HHS
KY 990601 – 0645	99-CHS-007 EPIDEMIOLOGY & LABORATORY C	HHS
KY 990601 – 0646	99-CHS-005 KENTUCKY DIABETES CONTROL P	HHS
KY 990601 – 0647	99-CHS-009 CHILD MENTAL HEALTH INITIATIVE	HHS
KY 990601 – 0648	99-CHS-010 PUBLIC HEALTH PREPAREDNESS	HHS
KY 990601 – 0649	99-CHS-008 HAZARDOUS SUBSTANCE EMERGE	HHS
KY 990601 – 0650	STONECIPHER FISH FARMS	EPA
KY 990601 – 0651	ASHLAND HEAD START PROGRAM	HHS
KY 990601 – 0652	GREEN THUMB, INC. SENIOR COMMUNITY SER	LABOR
KY 990601 – 0653	METRO GROUP HOMES, INC. STREET OUTREA	HHS

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KY 990601 – 0654	PROJECT FAMLY	HHS
KY 990601 – 0655	CITY OF BROMLEY COMMUNITY FACILITY LOA	RDA, USDA
KY 990601 – 0656	APEKS APPAREL, INC. PROJECT	RDA
KY 990601 – 0657	JEFFERSON CO. MIDDLE SCHOOL DRUG PREV	EDUC
KY 990601 – 0658	THE LOST SQUADRON RECRUITMENT AND ED	MA
KY 990601 – 0659	TELAMON CORPORATION FARMWORKER HOU	LABOR
KY 990601 – 0660	MURRAY BOARD OF EDUCATION HEAD START	HHS
KY 990604 – 0661	WHITLEY COUNTY SCHOOL CAMPUS CLINIC	HHS
KY 990604 – 0662	SHEPHERDSVILLE POLICE DEPARTMENT COP	DOJ
KY 990604 – 0663	BREATHITT COUNTY COPS UNIVERSAL HIRING	DOJ
KY 990604 – 0664	99-CFC-004 SOCIAL SERVICES BLOCK GRANT	HHS
KY 990604 – 0665	CITY OF INDEPENDENCE COMMUNITY CRIME P	DOJ
KY 990604 – 0666	DEPARTMENT OF CORRECTIONS SEX OFFEND	DOJ
KY 990604 – 0667	PADUCAH STREETScape	DOT
KY 990604 – 0668	CITY OF FRANKFORT POLICE DEPARTMENT U	DOJ
KY 990604 – 0669	BOONE COUNTY SAFE SCHOOLS/HEALTY ST	DOJ
KY 990604 – 0670	SANDY HOOK WATER DISTRICT RURAL WATER	RDA
KY 990604 – 0671	JEFFERSON COUNTY JUVENILE ACCOUNTABIL	DOJ
KY 990604 – 0672	FAYETTE COUNTY VICTIM'S ADVOCATE PROJE	DOJ
KY 990604 – 0673	BOYLE COUNTY PARTNERSHIP FOR TECHNOL	EDUC
KY 990604 – 0674	JACKSON COUNTY INDUSRTIAL BUILDING PRO	EDA